

Exhibit 19

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF MISSOURI

3 JOSHUA GLASSCOCK, on)
4 behalf of himself and)
5 all others similarly)
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A P P E A R A N C E S

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WITNESS: CHRISTOPHER MEYER

Examination by Mr. Werts

5

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1 STIPULATION

2 (It is hereby agreed by and between the
3 parties that signature is not waived.)

4 - - - - -

5 THE VIDEOGRAPHER: Good morning. We are
6 now on the record. Today's date is September
7 11th, 2024, and the time is 9:06 a.m.

8 This is the video-recorded deposition of
9 Chris Meyer in the matter of Joshua Glasscock
10 versus Sig Sauer, Incorporated, Case No.
11 22-CV-3095-SRB filed in the United States
12 District Court for the Western District of
13 Missouri.

14 This deposition is being held at the AC
15 Hotels Marriott at 299 Vaughn Street in
16 Portsmouth, New Hampshire.

17 The reporter's name is Beth Gaige. My
18 name is Craig Fear. I am the certified legal
19 videographer. We are with Lexitas Legal.

20 Would the attorneys please -- present
21 please introduce themselves and the parties
22 they represent beginning with the noticing
23 attorney.

24 MR. WERTS: Todd Werts on behalf of
25 plaintiff.

1 MR. MANN: Clint Mann on behalf of
2 plaintiff.

3 MR. WILLIAMS: Mike Williams on behalf of
4 plaintiff.

5 MR. JOYCE: Rob Joyce on behalf of Sig
6 Sauer.

7 THE VIDEOGRAPHER: Would the court
8 reporter now please swear in the witness and
9 then counsel may proceed.

10 (The Witness was administered the oath by
11 the Court Reporter.)

12 CHRISTOPHER MEYER, having been duly sworn by
13 the Notary Public, was examined and testified
14 as follows:

15 EXAMINATION

16 BY MR. WERTS:

17 Q. Morning.

18 **A. Morning.**

19 Q. Before we get into it, just a -- a couple of
20 guidelines for today. I know you and the
21 court reporter visited before we went on the
22 record about some of them so I'll not repeat
23 that stuff.

24 If you need to take a break at any time,
25 just tell me, and we can do that. I'll just

1 ask that you answer any pending question
2 before we head out. Is that okay?

3 **A. That is.**

4 Q. All right. Likewise, I will try very hard to
5 slow down today because I was chastised
6 yesterday, rightly so, for speaking too fast.
7 So if I overexaggerate it, bear with me.

8 The -- I'll also try to ask questions
9 that make sense; but if I fail in that
10 endeavor, tell me -- tell me what you don't
11 understand, and I'll try to ask you a better
12 question.

13 Does that work?

14 **A. It does.**

15 Q. All right. Can you please tell us your name?

16 **A. Christopher Meyer.**

17 Q. You're currently employed at Sig Sauer,
18 correct?

19 **A. That is correct.**

20 Q. You're in the customer relations department?

21 **A. Customer service, yes.**

22 Q. How long have you had been in the customer
23 service department?

24 **A. Just shy of nine years.**

25 Q. So November of 2015?

1 **A. That's correct.**

2 Q. What is your current title at Sig Sauer?

3 **A. Senior customer service manager.**

4 Q. How long have you been a senior customer
5 service manager?

6 **A. About two years.**

7 Q. What were you before that?

8 **A. The customer service manager.**

9 Q. How long were you a customer service manager?

10 **A. Roughly two years.**

11 Q. What was your job title prior to that?

12 **A. Customer service supervisor.**

13 Q. How long were you in that role?

14 **A. Roughly two years.**

15 Q. What was your role prior to that?

16 **A. Customer service lead.**

17 Q. How long were you in that role?

18 **A. That was about a year.**

19 Q. What was your role before that?

20 **A. Customer service representative.**

21 Q. How long were you in that role?

22 **A. Roughly two years, if I'm doing my math**
23 **correctly.**

24 Q. It does add up to nine.

25 **A. That's good.**

1 Q. And so it's my understanding you have been
2 designated by Sig Sauer to testify on a number
3 of topics today. Is that yours?

4 **A. Yes.**

5 MR. WERTS: Michael, can I see Exhibit 1
6 from yesterday? Exhibit 2, I'm sorry.

7 Could we mark that as Exhibit 1 for
8 today.

9 (Deposition Exhibit No. 1 was marked for
10 identification.)

11 BY MR. WERTS:

12 Q. You have been handed what we've marked as
13 Deposition Exhibit No. 1.

14 Have you seen that before?

15 **A. Yes.**

16 Q. And my understanding is that your on deck for
17 today for topics 1, 2, 3, 4, 5, 6, 13 as it --
18 I'm sorry -- 12 as it applies to other
19 incidents, 13 as it applies to incidents in
20 RMAs, 14, 15, 22, 23, and 24.

21 MR. JOYCE: By counsel that is confirmed.

22 **A. Yes.**

23 BY MR. WERTS:

24 Q. And you understand that for today's purposes
25 you're the designated voice of Sig Sauer, as

1 in you're speaking on behalf of the company?

2 **A. Correct.**

3 Q. And you've been authorized by Sig Sauer to do
4 that?

5 **A. Yes.**

6 Q. Tell me -- because you had a number of topics,
7 but what has Sig Sauer done to gather all of
8 its knowledge, known or reasonably available
9 to it, with respect to the matters that you've
10 been designated for in our Deposition Exhibit
11 1?

12 MR. JOYCE: I'm going to allow him to
13 answer, but that's an extremely broad
14 question.

15 But you can answer.

16 **A. Some of these I already had an understanding**
17 **of, and some we worked with business**
18 **intelligence to gather information.**

19 BY MR. WERTS:

20 Q. Which topics did you already have an
21 understanding of?

22 **A. 1 through 6. 12 is the -- the other**
23 **instances.**

24 Q. 12 as to case studies or investigations into
25 the P320, M-17 or M-18, including those

1 concerning the use of external safeties or
2 inadvertent discharges.

3 **A. Correct.**

4 Q. Yeah.

5 **A. So I was provided.**

6 **And 13. 14 would have been other**
7 **incidences. 15 would have been the other**
8 **instances. 22 would have been -- scratch**
9 **that. 22 would have been business**
10 **intelligence. 23 would have been business**
11 **intelligence, but that question is -- it's not**
12 **a question.**

13 Q. Okay. It's a topic.

14 **A. Mm-hmm.**

15 **And 24 I know.**

16 Q. And 24 was one that you already knew before
17 talking to business intelligence?

18 **A. Is one I know now, yes.**

19 Q. And my question on that was -- was that one
20 you had to prepare with business intelligence
21 to talk about today, or did you already come
22 into this with knowledge beforehand?

23 **A. Had nothing to do with business intelligence.**
24 **I came in knowing.**

25 Q. So the two topics that you had to work with

1 business intelligence on were 22 and 23, by my
2 count?

3 **A. That's correct.**

4 Q. What was done to prepare you to talk about
5 those two topics?

6 **A. Well, information was -- was gathered and**
7 **seeing what you -- what -- basically what --**
8 **what had been recorded over time.**

9 Q. What witnesses at Sig Sauer were made
10 available to you to talk about topics 22 and
11 23?

12 **A. In what sense?**

13 Q. People.

14 **A. There's a gentleman named Chris from business**
15 **intelligence that was helpful.**

16 Q. Did you talk to anyone else about those topics
17 in advance of today's deposition?

18 **A. Legal representation.**

19 Q. Anyone else?

20 **A. Not that I'm aware of.**

21 Q. What's Chris's last name?

22 **A. Cogden.**

23 Q. Do you know what his title is with Sig Sauer?

24 **A. I don't.**

25 Q. Do you know how to spell Cogden?

1 **A. C-o-g-d-e-n, I believe.**

2 Q. Did you look at any documents with Mr. Cogden?

3 **A. Yeah. They were -- yes, which I believe**
4 **are -- yeah. Yeah, I have looked at**
5 **documents.**

6 Q. What were they? What did you look at with Mr.
7 Cogden?

8 **A. A collection of firearms that had been, you**
9 **know, brought in or sold pertaining to these**
10 **questions.**

11 Q. When you say collection of firearms, do you
12 mean the guns themselves?

13 **A. Correct. Well, not -- not physically. I**
14 **wasn't looking at the physical guns.**

15 Q. Okay. That's the nature of my question.

16 **A. Oh, okay. No. Just data. This is -- yeah.**

17 Q. And what data were you looking at?

18 **A. This would be P320s that were coming in from**
19 **Missouri that were sold or otherwise.**

20 Q. Was this a spreadsheet?

21 **A. Yes.**

22 Q. Was there anything besides a spreadsheet that
23 you looked at with Mr. Cogden?

24 **A. Not that I'm aware of.**

25 Q. Was it one spreadsheet or multiple

1 spreadsheets?

2 **A. It's -- it's one spreadsheet.**

3 Q. Did it have multiple tabs?

4 **A. Not that I can recall.**

5 Q. What all information was contained on the
6 spreadsheet about these guns?

7 **A. Is what guns have come in for repair or
8 voluntary upgrade and -- yeah, that's what
9 came in.**

10 Q. Okay. So just an identification by serial
11 number?

12 **A. I believe it's by serial number, yes, and also
13 by sales to Missouri.**

14 Q. And so was -- did the same spreadsheet cover
15 sales and returns?

16 **A. I don't recall if those were two separate
17 spreadsheets or if they're tabbed -- that's
18 what -- that's what I -- I can't remember if
19 they're two separate ones or if it's one
20 that's tabbed, but -- because those were the
21 questions that were asked.**

22 Q. Okay. So let's talk -- take -- take those two
23 at a -- or one at a time.

24 On the returns was -- it had a list of
25 serial numbers to identify the guns, right?

1 **A. I believe so.**

2 Q. What else was provided about on the
3 spreadsheet?

4 **A. It would have been the reason code on why it**
5 **came in.**

6 Q. What is a reason code?

7 **A. A reason that a firearm would -- would come in**
8 **so...**

9 Q. What are the options?

10 **A. There's several. But, for example, voluntary**
11 **upgrade program would have been one. One if**
12 **it came in for some sort of failure, or one**
13 **did it come back and really any -- any reason**
14 **that you would have a return.**

15 Q. What else besides the serial number and the
16 reason code?

17 **A. There -- there might have been sales channel**
18 **so whether -- whether it's commercial or**
19 **direct to consumer.**

20 Q. Okay. What else?

21 **A. That I can confirm? Not -- not that I**
22 **remember because really we're looking for**
23 **serial number and reason code.**

24 Q. What information were you gleaning from an
25 individual serial number?

1 A. Well, there's a lot of information you can get
2 from a serial number, but --

3 Q. What's that?

4 A. What model it is. You can find when it was
5 made.

6 Q. What else?

7 A. You could possibly -- I mean, you could use it
8 to track what order it was part of originally.
9 Did it ship to this dealer -- dealer A or
10 dealer B.

11 Q. And what I'm looking for is as you're reading
12 the spreadsheet, you see a serial number. I
13 get the serial can be used for a variety of
14 reasons.

15 A. Mm-hmm.

16 Q. But you have more knowledge about the Sig
17 Sauer systems than I do, which is the nature
18 of today's exercise.

19 What are the -- you look at a Sig -- a
20 serial number. What is it you can learn just
21 from reading that alphanumeric code?

22 MR. JOYCE: He just answered that
23 question.

24 But can you answer it again.

25 MR. WERTS: Well, it was confused because

1 it went from being able to pick out details
2 from the number itself to what you might use
3 the number for, and I need to parse that out.

4 **A. Well, so I can tell what model it is, and then**
5 **by searching -- this -- this is when I can**
6 **find when it was made, and I could look in the**
7 **history of that serial number where it went.**

8 BY MR. WERTS:

9 Q. And when you say where it went, what
10 information does Sig Sauer have about that?

11 **A. It would be an order to a dealer.**

12 Q. If a gun came back, could you also use the
13 serial number to determine who the owner was
14 that sent that gun back to Sig Sauer?

15 **A. This would depend.**

16 Q. On?

17 **A. If the direct consumer contacted us, then,**
18 **yes. If it was sent back from a dealer, no.**

19 Q. With some products that -- that you buy,
20 there's, like, a way that a purchaser can
21 register their product for warranty purposes
22 and others with the -- the manufacturer.

23 Does Sig Sauer do something like that as
24 an offering to its customers?

25 **A. You can register your products with Sig Sauer,**

1 **but the warranty is not beholden to that**
2 **registration.**

3 Q. If a consumer chose to register their product
4 with Sig Sauer, that's information that they
5 would still have though, right?

6 **A. Yes.**

7 Q. Does Sig Sauer know roughly what percentage of
8 their customers choose to register their
9 firearms with Sig Sauer?

10 **A. I do not. It's fairly low.**

11 Q. Has Sig Sauer ever undertaken any effort to
12 study or determine what percentage of their
13 guns are being registered?

14 **A. Possible. Not that I'm aware of.**

15 Q. Going back to the spreadsheet that you looked
16 at with Mr. Cogden, has the serial number, the
17 reason for the return.

18 Was there any other information about
19 those guns contained on the spreadsheet?

20 **A. Not that I recall.**

21 Q. So just two columns?

22 **A. I believe there were other columns, but it**
23 **wasn't data that -- that I understood or had**
24 **any use to me.**

25 Q. Do you know whether Mr. Cogden made that

1 spreadsheet for this case or if that was a
2 report that he had otherwise?

3 **A. I believe it was made for this case.**

4 Q. Do you have an understanding of what system he
5 used to pull that report?

6 **A. I don't want to speak out of turn. I believe**
7 **it's a system called COGNOS.**

8 Q. Is that all caps, C-O-G-N-O-S?

9 **A. Yes.**

10 Q. What is your understanding of what COGNOS is?

11 **A. It's -- I -- I -- I don't use COGNOS on a**
12 **day-to-day basis. It's -- it's a program that**
13 **business intelligence uses.**

14 Q. Do you know what they use it for?

15 **A. Business intelligence.**

16 Q. What does that mean?

17 **A. It's -- it seems to be a collection of -- of**
18 **data.**

19 Q. Have you had any training on the COGNOS
20 system?

21 **A. I have not.**

22 Q. Have you ever used it?

23 **A. No.**

24 Q. Have you ever needed to ask someone to pull
25 information out of it for you?

1 **A. Yes.**

2 Q. In what context?

3 **A. I asked for commission data to be pulled for**
4 **orders monthly.**

5 Q. Sales compensation commission data?

6 **A. Correct. I have a team -- yeah, I have a team**
7 **that can also sell things.**

8 Q. Commission is one of those words that can
9 have, like, seven different meanings --

10 **A. Got it.**

11 Q. -- and so -- and we'll probably cycle back to
12 that.

13 But just generally you've got certain
14 people in the customer service department that
15 take orders on the phone or online?

16 **A. Mm-hmm. Yes.**

17 Q. And then they get paid for doing that.

18 **A. Correct.**

19 Q. Other than counsel and Mr. Cogden with
20 business intelligence, did you speak to anyone
21 else in preparation for today's deposition?

22 **A. Not that I can recall.**

23 Q. Did you look at any other documents besides
24 the two spreadsheets that we've talked about?

25 **A. The other documents. So the -- the other**

1 incidents.

2 Q. When you say the incidents, what are you
3 referring to?

4 A. I have them as a series of binders of the --
5 the other incidences. It's -- there -- they
6 should be here or you guys have them.

7 Q. What makes you say that?

8 A. I want to believe it's been --

9 THE WITNESS: I don't want to speak out
10 of turn here, but is that something that's
11 been provided?

12 MR. JOYCE: Yeah, it's been produced to
13 them.

14 BY MR. WERTS:

15 Q. I've got a bunch of them. Whether I have them
16 all or not, is one of the things we've got to
17 talk about, but I -- I do have other
18 incidents. And we'll look at some stuff
19 today.

20 A. Mm-hmm.

21 Q. We could make -- it would take a while to look
22 at every single one of them, wouldn't it?

23 A. It would.

24 Q. How many binders have you got?

25 A. Four.

1 Q. Is that just for the P320?

2 **A. That -- those incidents were collected for the**
3 **P320, yes.**

4 Q. Do you have binders like that for any other
5 gun line that Sig Sauer makes?

6 MR. JOYCE: Objection. Beyond the scope.
7 Foundation.

8 You can answer.

9 BY MR. WERTS:

10 Q. Well, one of the topics is comparative
11 analysis between gun models.

12 But go ahead.

13 **A. I have not been part of any lawsuits for any**
14 **other firearm. So, no, I do not have any**
15 **instance reports.**

16 Q. All right. We're going to come back to that,
17 but let's -- let's knock out your most
18 exciting topic, which is the org chart.

19 Who's the person at the top?

20 **A. Ron Cohen, R-o-n, C-o-h-e-n.**

21 Q. Who reports to Mr. Cohen?

22 **A. I believe he has 15 reports.**

23 Q. They are?

24 **A. I don't know all 15 of them. I -- I -- I can**
25 **tell you who I report to in that chain, but**

1 folks like Ron Gosselin and Jack Barnes, and a
2 gentleman named Robby Johnson.

3 Q. Anyone else?

4 A. I'm just trying to remember if they report --
5 if they're direct reports to Ron or otherwise.

6 Daryl Hanna is someone else who reports
7 to Ron.

8 Q. Each of these people that report to Mr. Cohen,
9 do they each lead up separate departments?

10 A. Correct.

11 Q. Can you tell me what the departments are?

12 A. So Jack Barnes would be commercial sales. Ron
13 Gosselin would be operations. Robby Johnson
14 would be product management. And Daryl Hanna
15 I don't recall. I don't work with him that
16 often, but -- I -- I don't know his -- his --
17 his direct. It's not -- I'd say it might --
18 might be business intelligence. It might be
19 something -- I'm not quite sure.

20 Q. And understanding you don't remember it, can
21 you kind of generally describe, like, Daryl
22 Hanna, what's he do for the company?

23 A. It could be operations or finance based. I
24 know -- the reason I've worked with him was to
25 approve a software that I wanted to implement.

1 Q. Okay. Like getting their permission to go buy
2 something expensive?

3 **A. Correct.**

4 Q. What are some of the other departments at Sig
5 Sauer, the way they were, like, organized in
6 the business operations?

7 **A. There's the academy where we do training.**
8 **There's ammunition and optics; global defense**
9 **sales, which would also go into law**
10 **enforcement.**

11 Q. Just briefly just so I understand, is law
12 enforcement under global defense or its own
13 separate department at that level?

14 **A. They -- they work hand in hand a lot of the**
15 **times, so they are -- but they are their own**
16 **departments but they're very much kind of**
17 **enmeshed.**

18 Q. And they're all Sig Sauer employees.

19 **A. Correct.**

20 Q. I mean, it's -- it's a team. All right. And
21 I get that. Just trying to -- ultimately just
22 trying to get a sense of how you guys go about
23 doing stuff.

24 **A. Mm-hmm.**

25 Q. There's a bunch of work that's got to get

1 divvied up. I just want to understand who's
2 doing what.

3 **A. Certainly.**

4 Q. So what else we got?

5 **A. And then there's our trainer team.**

6 Q. What else?

7 **A. IT, finance, legal. I think that's all of it.**

8 Q. So a -- a couple of, I guess, groups that at
9 least I know that exist like marketing.

10 Where do they fit within the structure?

11 **A. Outside my memory, marketing. Can't believe I**
12 **forgot that.**

13 Q. What about manufacturing?

14 **A. That would go under operations, so it's Ron**
15 **Gosselin.**

16 Q. Where does customer service fall?

17 **A. Right now we -- we fall under operations.**

18 Q. There's a guy at Sig Sauer named Al
19 Larochelle.

20 Do you know who that is?

21 **A. I do.**

22 Q. Who's that?

23 **A. Al Larochelle is a gunsmith who works hand in**
24 **hand with repair and law enforcement.**

25 Q. Where does he fit within this?

1 **A. He's retired.**

2 Q. Okay. Where did he fit in this?

3 **A. I believe he was in law enforcement or**
4 **operation -- he would have been under law**
5 **enforcement, I believe. Potentially under**
6 **operations on -- in the repair department.**

7 Q. Is ops who then runs the repair department?

8 **A. Say again?**

9 Q. Is operations who runs the repair department?

10 **A. Operation -- the repair department reports to**
11 **operations.**

12 Q. Where does design engineering fit within the
13 structure?

14 **A. That'd be R and D.**

15 Q. Was that another one at the top level?

16 **A. It would be, yes.**

17 Q. Coming into this, was anything done to help
18 prepare you to go through the org chart?

19 **A. Well, looking at the questions, I thought it**
20 **would have been the org chart of -- pertaining**
21 **to repairs for the 320 and not -- not for the**
22 **entire company.**

23 Q. Okay. The top -- just -- just by way of
24 defending myself, the top one was the general
25 organizational management and geographic

1 structure of defendant's offices, divisions
2 and facilities. So I agree that -- that
3 there's a specific topic to the 320, but just
4 kind of broader, as well.

5 All right. Are all of these operations
6 inside the United States?

7 Are all of these departments within the
8 United States?

9 **A. Those departments, yes.**

10 Q. Are there any departments for Sig Sauer that
11 are not inside the United States?

12 **A. I believe global defense sales, I mean, they**
13 **travel quite a bit.**

14 Q. Sure.

15 **A. And then there -- I believe there's a**
16 **facility -- yeah, there's a facility in Israel**
17 **and there is one in India, I believe.**

18 Q. What do they do?

19 **A. Just support -- support contracts globally.**

20 Q. Is it fair to say that the Israel and India
21 foreign locations don't have anything to do
22 with U.S. consumer -- United States consumers?

23 **A. That would be fair.**

24 Q. Okay. Good. That makes it easier. I won't
25 talk about it then.

1 **A. Okay.**

2 Q. The -- probably going to go back to the
3 broader scope that you said you were prepared
4 to talk about, the P320. Let's fill in from
5 there and see where that gets us.

6 What was done to prepare to talk about
7 the identity and structure of Sig Sauer's
8 offices, divisions, and facilities responsible
9 for maintaining complaints related to the
10 P320, M-17 and M-18?

11 **A. So this is one that I knew -- I knew about.**

12 Q. Okay. And so let's just kind of go through it
13 in order. Let's identify those offices,
14 divisions, and facilities.

15 Who are they?

16 **A. So customer service, my department. There is**
17 **inside sales, which goes under operations.**
18 **Essentially customer service for dealers. Law**
19 **enforcement. And then the -- the custom shop,**
20 **which we could call the repair shop for**
21 **understanding. And legal.**

22 Q. And so the custom shop, just tell us what that
23 is.

24 **A. This is where products are repaired, modified**
25 **to fit the consumer's needs.**

1 Q. If I wanted to special order a gun from the
2 website, that's an option, right?

3 **A. That is an option. It would not be through**
4 **there.**

5 Q. Oh, okay. If I'm doing a special order
6 through the website, how does that work?

7 **A. That'd be someone on my team would place the**
8 **order, and then that's made in our**
9 **manufacturing floor.**

10 (Background noise)

11 MR. WERTS: Didn't have that yesterday.
12 That's new.

13 BY MR. WERTS:

14 Q. Is there one manufacturing floor for the P320?

15 **A. Define manufacturing.**

16 Q. I was just picking up -- following up on what
17 you said. You said you send it to the
18 manufacturing floor. That's one place. And
19 so I'm trying to understand if that is true or
20 not.

21 **A. Okay. Yeah, those guns are built in -- in the**
22 **facility in Pease.**

23 Q. Is that New Hampshire?

24 **A. Correct.**

25 Q. So all P320s are built at the Sig Sauer

1 manufacturing facility in Pease, New
2 Hampshire?

3 **A. I am not -- I'm not sure if I can speak**
4 **definitely if all P320s are built right there.**

5 Q. But they build P320s at Pease, New Hampshire.

6 **A. Yes.**

7 Q. Do you believe that the P320s are built
8 somewhere else other than Pease, New
9 Hampshire?

10 **A. It's possible for global contracts or things**
11 **of that nature that they have to be built**
12 **on-site there; but I believe -- I believe that**
13 **the majority, if not -- actually I believe**
14 **that all of the commercial P320s are built in**
15 **New Hampshire.**

16 Q. And that may be and -- and for today's
17 purposes I'm interested in U.S. guns only.

18 **A. Those would all built in New Hampshire.**

19 Q. Okay. At the Pease facility?

20 **A. That I couldn't say definitively.**

21 Q. Is there another one? Is there another
22 manufacturing facility in New Hampshire?

23 **A. Yes.**

24 Q. Okay. How many?

25 **A. There is Exeter and Rochester.**

1 Q. Any others?

2 **A. Manufacturing.**

3 Q. Do you know whether the majority of the U.S.
4 P320s would have been built at the Pease, New
5 Hampshire, facility going back to 2017?

6 **A. Not that I could say definitively.**

7 Q. Going into today, was anything done to prepare
8 you to talk about where the P320s were
9 manufactured?

10 **A. Specifically to that, no.**

11 Q. We talked briefly with the R and D department.
12 Where's that located?

13 **A. Exeter.**

14 Q. Does Sig Sauer just have one R and D
15 department?

16 **A. Our optics division has their own R and D, as
17 would ammo.**

18 Q. But for firearms there's just the one group?

19 **A. Correct.**

20 Q. How long has the R and D group been at the
21 Exeter, New Hampshire, facility?

22 (Background noise)

23 MR. JOYCE: I'm going to ask -- let's
24 take a short break.

25 MR. WERTS: Yeah.

1 MR. JOYCE: I'm going to ask the front
2 desk what is going on.

3 MR. WERTS: Yeah, thank you.

4 THE VIDEOGRAPHER: This is the end of
5 Media No. 1. We are going off the record.
6 The time is 9:46 a.m.

7 (Recess taken.)

8 THE VIDEOGRAPHER: This is the beginning
9 of Media No. 2. We are going back on the
10 record. The time is 10:08 a.m.

11 BY MR. WERTS:

12 Q. All right. We were talking a little bit about
13 some of the different facilities.

14 Your customer service team, are you all
15 located in one location or multiple locations?

16 **A. We work remote.**

17 Q. Okay. How long have you all worked remote?

18 **A. Since COVID.**

19 Q. Prior to COVID did you work in a centralized
20 location?

21 **A. We did.**

22 Q. Where was that located?

23 **A. Exeter.**

24 Q. And that's just a single centralized location
25 prior to COVID?

1 **A. Correct.**

2 Q. We talked a little bit about product
3 management.

4 Where are those folks located?

5 **A. Product management is based out of Pease.**

6 Q. Does the entire product management team work
7 out of Pease?

8 **A. I believe so. Occasionally remote.**

9 Q. Within the product management umbrella, is
10 there a particular product management team for
11 the P320?

12 **A. No.**

13 Q. Is there any subdivisions within the product
14 management group?

15 **A. Yeah, striker-fired.**

16 Q. As compared to what?

17 **A. Hammer-fired, rifles, silencers and ammo,
18 optics.**

19 Q. And is that basic product line division of
20 labor between striker-fired, hammer-fired,
21 rifles, silencers, suppressors and optics been
22 the same going back to at least 2017?

23 **A. What do you mean the same? Same staff or has
24 there always been --**

25 Q. The same organization structure.

1 **A. I believe so.**

2 Q. So you started with the company in 2015,
3 correct?

4 **A. Correct.**

5 Q. The P320 had been launched by that point,
6 right?

7 **A. It had.**

8 Q. When you started working with Sig Sauer, did
9 Sig Sauer have any policies for how to respond
10 to complaints about the Sig Sauer P320?

11 **A. Not specifically with the 320.**

12 Q. Did they have general policies and procedures
13 of how to respond to complaints from guns in
14 general?

15 **A. Yes.**

16 Q. At any point since then, has Sig Sauer
17 developed policies or procedures for dealing
18 with complaints related to the P320 that are
19 different than those used for other guns in
20 general?

21 **A. The custom shop has a specific form for all**
22 **firearms.**

23 Q. Anything else?

24 **A. And -- but, no, there's -- there's nothing**
25 **specific to the P320.**

1 Q. What are the different ways in which Sig Sauer
2 becomes aware of complaints about the Sig
3 Sauer P320?

4 **A. Any complaint?**

5 Q. Mm-hmm.

6 **A. So I'd say first line would be customer**
7 **service. Customer calls in, contacts us.**
8 **And, you know, variable legitimacy, but you**
9 **could go to social media, the internet in**
10 **general.**

11 **And then dealer services, LE, they --**
12 **they make the calls. It's the same --**
13 **actually if you say just contacting Sig, is**
14 **contacting us by any channel.**

15 Q. And what are those channels that are available
16 for contacting Sig Sauer about a firearm
17 complaint?

18 **A. Customer service; law enforcement; and you**
19 **have, you know, military global sales called**
20 **DSG, and social media.**

21 Q. Let's take those in turn.

22 Looking at customer service, like
23 mechanically how would a customer go about
24 getting ahold of the customer service
25 department at Sig Sauer?

1 **A. E-mail, call, chat.**

2 Q. Any others?

3 **A. No.**

4 Q. Okay. Going back to 2017, what e-mail system
5 have you used in the customer service
6 department?

7 **A. It's an e-mail inbox.**

8 Q. What program?

9 **A. Outlook.**

10 Q. Does the customer service department use any
11 program like Salesforce or other customer
12 management software?

13 **A. We do not currently use a CRM.**

14 Q. Have you ever used a CRM?

15 **A. No.**

16 Q. How are customer contacts tracked then?

17 **A. We used a program called Oracle EBS.**

18 Q. What do you use Oracle EBS for?

19 **A. We use it as -- as a CRM.**

20 Q. I'm just trying to reconcile the answers you
21 gave.

22 You don't use a CRM, but you use it as a
23 CRM?

24 **A. Yes. So it's -- Salesforce is a customer**
25 **relationship management program. Oracle EBS**

1 can work as a CRM. It's not called that. So
2 everyone -- we have customer accounts -- I
3 don't want to get too technical on you there.

4 Q. Maybe let's approach this one different.

5 You get to work in the morning. What are
6 all the programs that you need to do your job
7 in the customer service department?

8 **A. You need Oracle EBS and Magenta and Task.**

9 Q. Do you need Outlook?

10 **A. Yeah, you need Outlook.**

11 Q. What else?

12 **A. And LiveChat.**

13 Q. Anything else?

14 **A. No.**

15 Q. So you've got five programs. Does that sound
16 right?

17 You get there and log in, you've got to
18 launch five programs?

19 **A. That's for the -- for the daily customer
20 service use for incoming, yes.**

21 Q. Okay. Are there other programs that you
22 sometimes have to use?

23 **A. I can -- I will sometimes use a program --
24 there's a program called Sprout, but I don't
25 currently have access to it because we just**

1 lined up with it but that -- it just collects
2 social media inquiries in one spot.

3 Q. Anything else?

4 A. We -- we use Salesforce to a degree. Well,
5 I -- I have access to Salesforce, but I -- I
6 use it probably once or twice a year because
7 that's really used on the sales end. It's --
8 it's not their CRM. It's another version of
9 Salesforce.

10 Q. Which part of the Salesforce ecology is Sig
11 Sauer using then?

12 A. I'm not quite sure what it's -- what that --
13 what it is called.

14 Q. But it's the sales guys that use it?

15 A. Correct.

16 Q. And when we say sales folks, are we referring
17 to consumer sales?

18 A. These are the dealer sales.

19 Q. What about the folks we talked about earlier
20 that you have to pull commission reports for?

21 A. That's done through COGNOS, but I don't have
22 access to COGNOS.

23 Q. Different -- I'm sorry, I didn't ask a good
24 question. I was referring to the set of
25 people that you have to get COGNOS reports for

1 for commission sales.

2 **A. Mm-hmm.**

3 Q. Do those people use Salesforce?

4 **A. They may. I don't know.**

5 Q. Are they not part of the customer service
6 department?

7 **A. No.**

8 Q. What department are they from?

9 **A. They'd be from business intelligence.**

10 Q. Business intelligence people interact with
11 customers to sell firearm accessories?

12 **A. No -- okay. So I misunderstood your question.**

13 **Are you saying customers -- so folks on**
14 **the customer service team who sell things to**
15 **customers, what do they use to sell things?**

16 Q. Yes.

17 **A. Magenta.**

18 Q. Anything else?

19 **A. You can sell through EBS. Not common but you**
20 **can.**

21 Q. All right. I'm just going to talk about these
22 programs one at a time.

23 **Has Sig Sauer been using Oracle EBS since**
24 **at least 2017?**

25 **A. Yes.**

1 Q. Has Sig Sauer been using Magenta since at
2 least 2017?

3 **A. We onboarded Magenta around that time period.**
4 **We did not have it when I started.**

5 Q. But you don't -- you don't remember when the
6 break-over date was?

7 **A. I don't.**

8 Q. Do you have an estimate?

9 **A. I don't.**

10 Q. Sometimes using like a benchmark is helpful.

11 Do you recall whether it was before or
12 after the voluntary upgrade program?

13 **A. I don't. It would have been around that**
14 **period of time, but I don't know when we**
15 **exactly implemented it.**

16 Q. Was there a different program that Sig Sauer
17 was using for the same functions prior to the
18 advent of Magenta?

19 **A. No.**

20 Q. Has Sig Sauer been using Task since at least
21 2017?

22 **A. Yes.**

23 Q. Has Sig Sauer been using Outlook as its e-mail
24 appliance since at least 2017?

25 **A. Yes.**

1 Q. Has Sig Sauer been using LiveChat since at
2 least 2017?

3 **A. No.**

4 Q. When was LiveChat implemented at Sig Sauer?

5 **A. About two years ago.**

6 Q. 2022-ish?

7 **A. Around there.**

8 Q. Was Sig Sauer using something else for the
9 same or similar functions as LiveChat before
10 that implementation?

11 **A. No.**

12 Q. When we were talking a moment ago about the
13 different ways that people could contact
14 customer service, you mentioned chat was one
15 of them.

16 Is that right?

17 **A. Correct.**

18 Q. Was that through this LiveChat program?

19 **A. Correct.**

20 Q. Has there ever been any other chat pathway
21 that a Sig Sauer customer could get ahold of
22 Sig Sauer prior -- or since 2017?

23 **A. No.**

24 Q. Sig Sauer's telephone system, you indicated
25 that folks could call in.

1 Does Sig Sauer use a VOIP or V-O-I-P
2 telephone system?

3 **A. Can you define that?**

4 Q. Voice over the internet protocol.

5 **A. We do now, yes.**

6 Q. Okay. When was that system rolled out?

7 **A. About six months ago.**

8 Q. What system is Sig currently using for
9 telephone services then?

10 **A. Task.**

11 Q. What system was Sig Sauer using for telephone
12 services before Task?

13 **A. It was Task. It was changed over to not
14 needing physical phones and going through the
15 ether.**

16 Q. And I'll preview my next question just for
17 completeness.

18 What is Task used for?

19 **A. Task is used as a -- for phone calls.**

20 Q. Based on the name I had in my mind like some
21 sort of a task list, but that's not what it's
22 used for; is that fair?

23 **A. Correct.**

24 Q. Got it.

25 Does Task record incoming phone calls to

1 Sig Sauer?

2 **A. It does.**

3 Q. Does it record all incoming phone calls to Sig
4 Sauer?

5 **A. It records most of them, unless they're**
6 **blocked, or if Task has an error on their end.**

7 Q. How long are those recorded phone calls kept
8 for?

9 **A. A year.**

10 Q. Has anything been done to preserve phone calls
11 related to the P320?

12 **A. Yes.**

13 Q. What's that?

14 **A. So all -- what -- what instances with the 320**
15 **are you referring to?**

16 Q. Where phone calls have been preserved.

17 **A. In the instance of unintentional discharges,**
18 **320 or otherwise, all phone calls are -- are**
19 **sent over to legal. I don't -- I can't track**
20 **phone calls or I don't track phone calls for**
21 **all 320 phone calls.**

22 MR. WERTS: Go ahead. You need to take a
23 break or --

24 **THE WITNESS: No, that's fine. Turn my**
25 **phone back off.**

1 BY MR. WERTS:

2 Q. Let's talk about the unintentional discharge
3 phone calls then.

4 Within the Task system how do you go
5 about marking or flagging that that is a call
6 related to an unintended discharge?

7 **A. The customer service representative brings it**
8 **to -- brings it to my attention.**

9 Q. Okay. And then what do you do?

10 **A. I go into Task and I pull the call.**

11 Q. What does that mean?

12 **A. You go into Task, find the phone number or the**
13 **call that came in and save it; and then I**
14 **would forward that over to legal.**

15 Q. Where do you save it?

16 **A. Well, I just -- I -- I grab it from Task and**
17 **then copy/paste it into this e-mail.**

18 Q. Is it like an MP3 file or something?

19 **A. Yeah.**

20 Q. Do you maintain your own copy of those phone
21 calls?

22 **A. Not officially.**

23 Q. Unofficially?

24 **A. I -- I may have a lot of them in -- in my**
25 **e-mail, but the official record is with legal.**

1 Q. Does Task also handle, like, voicemail
2 services for Sig Sauer?

3 A. Yeah.

4 Q. If a voicemail is left about an unintended
5 discharge, are those also preserved?

6 A. Yes. It would also eventually lead to a phone
7 call. I'm not aware of an instance where it's
8 been a voicemail that -- yeah, it's -- but,
9 yeah, it would -- it would be recorded if that
10 instance did occur.

11 Q. And ultimately that's what I'm trying to get
12 at is, if somebody left a voicemail and
13 somebody called back about an unintended
14 discharge, would you keep both of the
15 recordings or just the one?

16 A. Probably -- it really depends on the
17 voicemail. Generally people are pretty short
18 on voicemail. I can't say -- I can't think of
19 an instance where we've had a voicemail off
20 the top of my head. But the phone call that
21 had the pertinent information is the one that
22 would certainly be kept.

23 Q. What about LiveChat; how long are those chats
24 kept for?

25 A. I want to say -- I can't say definitively, but

1 I want to say three months is what they quoted
2 us.

3 Q. And do LiveChats related to unintended
4 discharge get saved in any way?

5 A. Any unintended discharge is brought to the
6 phone queue for recording.

7 Q. What does that mean, bringing a LiveChat to
8 the phone queue?

9 A. If you -- if you chat or e-mail with us about
10 an unintended discharge, we ask that you call
11 in because we would want it on the recorded
12 line.

13 Q. Are those chats regarding unintended discharge
14 that eventually get pushed over to a live
15 phone call, are those chats preserved?

16 A. I'm not sure, but we -- we -- the policy that
17 I put in place was to stop that conversation
18 quickly in chat, and -- and bring it to the
19 phone queue, just because it gets convoluted
20 in writing as to what they're talking about.
21 You just want the details to be able to hammer
22 it out and clear the air, so...

23 Q. But as you sit here, do you know one way or
24 another whether there's any policy or practice
25 about preserving those initial chats before

1 they get shunted over to a live call?

2 **A. Not that I'm aware of, no.**

3 Q. Have you ever searched the LiveChat system for
4 information regarding customer communications
5 regarding unintended discharge?

6 **A. It's a rare instance where someone would chat**
7 **about those, but I have not -- I have not**
8 **searched for -- for those.**

9 Q. Do you know whether anyone on your team ever
10 has?

11 **A. They would be brought to my attention if they**
12 **had. I can -- I'm not aware of any instance.**
13 **Just due to the nature of chat, usually**
14 **someone's browsing the website and wants a**
15 **quick question answered. It's not generally**
16 **something that invites a conversation. Like**
17 **about a -- any sort of firearm repair is**
18 **something that we have -- we try to bring to**
19 **the phone where we have the -- the CSR, the**
20 **customer service representative call out just**
21 **because it's -- there's a lot of details to**
22 **collect.**

23 Q. Let's talk about the Magenta system a little
24 bit.

25 You said that's a sales system?

1 **A. Mm-hmm.**

2 Q. What does it do for you?

3 **A. It's -- it's the back end of the website. So**
4 **anything that you can buy on our website, it**
5 **allows my team to sell it to the consumer.**
6 **So, of course, not include firearms, regulated**
7 **items.**

8 Q. Can a consumer buy a firearm on the Sig Sauer
9 website and have it shipped to an FFL dealer?

10 **A. Through the custom works program, they can**
11 **have one custom built.**

12 Q. But not a base model?

13 **A. Not a base model, no.**

14 Q. All right. So I want to just kind of get an
15 understanding about how these programs
16 interact with your customer service
17 department.

18 Customer calls in because they've -- the
19 background is they've had an unintended
20 discharge. They're calling in. Of course,
21 your customer service representative has no
22 idea why the person's call when they pick up,
23 right?

24 **A. Correct.**

25 Q. Okay. And so shortly into the conversation

1 they find out that it's an unintended
2 discharge.

3 **A. Mm-hmm.**

4 Q. What is your -- is the policy of how the
5 customer service representatives -- what are
6 they supposed to do?

7 **A. They -- we -- we want to get as much
8 information about the scenario as possible.**

9 Q. How do -- is the customer service team in a
10 particular way to go about making that
11 inquiry?

12 **A. Yes. We have an unintentional discharge form.
13 Any unintended discharge, P320 or otherwise,
14 they would ask these questions.**

15 Q. Has that been the case since at least 2017?

16 **A. I know we did that when I started, which was
17 in 2015. I would say I -- because the form
18 has maybe been updated from -- to include is
19 there a police report or is there any sort of
20 medical.**

21 But in general for as long as I've been
22 working here, it's always been you try to
23 collect as much information as possible.

24 Q. What happens next with that information once
25 it's gathered from the customer service

1 representative?

2 **A. It would be on that customer's file.**

3 Q. What do you mean that customer's file?

4 **A. Meaning Oracle. During the phone call, we'd**
5 **ask name, address, phone number.**

6 Q. Does Sig Sauer maintain an individual customer
7 file for every customer it interacts with?

8 **A. If they call in, we would build an account.**

9 Q. Does Sig keep those accounts forever?

10 **A. Correct. Oracle EBS you cannot delete.**

11 Q. So as much as you can imagine the Oracle EBS
12 data form in your mind --

13 **A. Mm-hmm.**

14 Q. -- can you go through what the fields are that
15 your customer service representatives fill out
16 when they're creating an individual customer
17 service account?

18 **A. Name, phone number, e-mail address, physical**
19 **address.**

20 Q. Anything else?

21 **A. No, that's -- that's it.**

22 Q. Is there any sort of drop-down indicating what
23 product they're calling about?

24 **A. No.**

25 Q. How do you record or annotate whether

1 someone's calling about a P320 versus a --
2 some other pistol in the lineup?

3 **A. Well, they would tell us and we would issue an**
4 **RMA, return merchandise authorization, which**
5 **would associate with the serial number.**

6 **Q. We'll come to the RMA in just a second.**

7 Before we get to the point of issuing
8 RMA, is there kind of a free-form text notes
9 field within the Oracle system for your staff
10 to record things?

11 **A. On the account you can leave notes on -- yes,**
12 **on that account.**

13 **Q. And is your staff trained to leave notes on**
14 **every call?**

15 **A. On calls where it's -- where it's warranted,**
16 **yes.**

17 **Q. What does it mean to be warranted?**

18 **A. If someone calls in and they say, hey, do you**
19 **guys have magazines in stock and, we go, yes,**
20 **and then they hang up, then it's not**
21 **warranted.**

22 We make a note if we set up an account
23 and they call in and say, hey, I'm really
24 interested in magazines; my name is, you know,
25 Jane Doe; this is my address where I can

1 receive them; and they say, oh, I have to go;
2 they would generally note and say called
3 inquiring about magazines but had to leave.

4 Q. Got it.

5 So if you get enough -- or far enough in
6 the call that you get the person's identity,
7 you're either going to build out an account or
8 try to add it to that person's account?

9 A. Correct.

10 Q. And is the goal for each individual to have
11 one account?

12 A. Yes. It's associated with their -- their
13 e-mail.

14 Q. Okay. Right. But my point is I call in in
15 January for some question about one pistol; I
16 call back six months later; the goal is not to
17 create two separate accounts for me but to get
18 all that information into one individual
19 account, correct?

20 A. Correct. And provided you call from the same
21 number or have the same contact information.
22 It's -- it's easier for my team to not have to
23 rebuild an account, and Oracle will flag and
24 say this is a repeat account.

25 Q. Got it. Nothing's perfect, but that's the

1 goal, right, for individual accounts?

2 **A. The goal is -- yes, it's ideal to have**
3 **everything on one account.**

4 (Brief interruption.)

5 (Off-the-record colloquy.)

6 BY MR. WERTS:

7 Q. Has the way Sig Sauer tracks calls or reports
8 about unintended discharges changed since
9 2017?

10 **A. No. It's been to Task, and Oracle EBS has not**
11 **changed it.**

12 Q. But within the way you use those systems, have
13 you -- there been any changes in the policies
14 or procedures for tracking unintended
15 discharges?

16 **A. No, it's always forwarded to legal, notes in**
17 **Oracle, calls recorded in Task.**

18 Q. You indicated you use the same procedure for
19 reporting information about unintended
20 discharges regardless of which model firearm
21 it is, correct?

22 **A. Correct.**

23 Q. How -- has Sig Sauer ever undertaken any
24 effort to compare how many reports of
25 unintended discharges it gets related to the

1 P320 as compared to any of its other
2 offerings?

3 **A. I'm unaware of a direct comparison. I would**
4 **say that 320 being compared to our 226, they**
5 **sell -- we sell phenomenally more 320s than we**
6 **do the 226, so it could be -- but no, no**
7 **direct comparison from sales to -- that I'm**
8 **aware of.**

9 Q. And that -- that's a second line of inquiry
10 that I want to get into in -- relative to
11 comparison to sales numbers, but I'm just
12 talking about raw numbers of complaints.

13 Any effort to compare or track X number
14 of unintended discharge reports on the P320, Y
15 number on the 226, the Z number on the 365;
16 any effort to make that sort of comparison?

17 **A. Not directly.**

18 Q. How about indirectly?

19 **A. I should say not that I'm aware of.**

20 Q. And again not making a comparison to number
21 of -- of pistols that are sold, are there more
22 complaints of unintended discharge for the
23 P320 than Sig Sauer's other offerings?

24 **A. Yes.**

25 Q. How long has that been the case?

1 **A. Probably I'd say the -- how long has that been**
2 **the case? How long has it been that it's been**
3 **more 320s?**

4 Q. Mm-hmm.

5 **A. I'd say once the initial lawsuits started**
6 **happening.**

7 Q. Has any effort been -- let me ask it this way.
8 You indicated that there are more
9 complaints about the P320 than Sig Sauer's
10 other guns.

11 How much more?

12 **A. I -- I -- I don't know. I don't have that**
13 **number.**

14 Q. Do you have an estimate?

15 **A. Not -- I do not.**

16 Q. Is it materially more?

17 **A. I would say we have roughly around 200 claims**
18 **on -- on the 320.**

19 Q. How many do you get on the 365?

20 **A. That I'm not aware of.**

21 Q. Have you ever had any?

22 **A. I believe so, yes.**

23 Q. Now, let's compare it to sales.

24 Has Sig Sauer undertaken any effort to
25 calculate the rate in which individual

1 incidents of inadvertent discharges of the
2 P320 have occurred?

3 **A. More of a rephrasing of the previous question?**

4 Q. No. Now, I'm getting back to the question you
5 wanted to answer originally. Not that you
6 were doing anything wrong, just I wanted to go
7 in a certain order.

8 You sell more P320s than other guns,
9 right?

10 **A. Mm-hmm.**

11 Q. Is that a yes?

12 **A. Correct.**

13 Q. P320 is Sig Sauer's top selling pistol.

14 **A. I believe it is currently, yes.**

15 Q. Given that, what efforts have been made to
16 calculate the rate at which there have been
17 reports of inadvertent discharges compared to
18 the number of sales?

19 **A. Well, all unintended discharges are reported**
20 **to legal. We have around 200 reports of the**
21 **320. There's about 4 million P320s out there.**

22 Q. How do you come to that 4 million number?

23 **A. That's by calculating how many 320s have been**
24 **sold globally.**

25 Q. And that was a good example of a bad question.

1 Of those 4 million, do you have a sense
2 of how many of those were sold to consumers?

3 **A. I want to say it's roughly three-quarters.**

4 Q. And then do you have -- understand what
5 percentage was sold to law enforcement
6 agencies?

7 **A. No, I don't have -- so I want to say that LE**
8 **is part of the 75 percent. I'm -- I'm not**
9 **sure I could speak to those numbers exactly**
10 **split up in that kind of way.**

11 Q. When you were giving the 75 --

12 MR. JOYCE: Counsel, I think those
13 numbers have been provided in discovery
14 responses in the case.

15 But go ahead.

16 BY MR. WERTS:

17 Q. The -- what would making up the other 25
18 percent of what you were thinking of in your
19 mind?

20 **A. Global sales and military.**

21 Q. You anticipated my next question.

22 Did the sales to the U.S. Army count --
23 when you're thinking of it -- count within
24 that global sales number?

25 **A. I believe so, yes.**

1 Q. So you said you've got four binders of --
2 related to complaints of unintended discharges
3 for the P320, right?

4 **A. Correct.**

5 Q. Where do you keep those?

6 **A. Personally?**

7 Q. Mm-hmm.

8 **A. At my house.**

9 Q. Okay. When you say binders, are we talking
10 half-inch binders, 4-inch binders?

11 **A. They're probably 3- or 4-inch binders.**

12 Q. So, you know, a little over a foot of binders?

13 **A. Correct.**

14 Q. I'm just trying to get a picture in my mind of
15 what we're talking about.

16 **A. There's -- there's a lot of documentation when
17 it comes to unintended discharges, yes.**

18 Q. Okay. And then how are they organized within
19 those binders?

20 **A. I believe in order of when -- when they
21 happened.**

22 Q. Do you have, like, tabs that divide them?

23 **A. Mm-hmm.**

24 Q. Is that a yes?

25 **A. Yes, yes. Sorry.**

1 Q. You say there's a lot of documentation that
2 goes into that binder.

3 What do you keep in that binder?

4 **A. It would be the reports from the law**
5 **enforcement agencies, as well as notes from**
6 **our technicians.**

7 Q. Anything else?

8 **A. That would include pictures.**

9 Q. Anything else?

10 **A. It's -- it's all things of that like.**

11 Q. Okay. So you've got your binder set, right,
12 that you keep at your house?

13 **A. Correct.**

14 Q. Is that the official Sig Sauer library of
15 unintended discharges related to the P320?

16 **A. That is what was provided from discovery.**

17 Q. Okay. And that helps to answer my question,
18 because what I'm trying to figure out is
19 whether you have a copy of what was produced
20 in discovery or you have the copy from which
21 the discovery was created -- responses were
22 created.

23 Does that make sense?

24 So, like, if a document gets sent to me,
25 it has to come from somewhere at Sig, right?

1 **A. Correct.**

2 Q. Okay. Are you where those come from or do
3 they come from somewhere else?

4 **A. They come from somewhere else.**

5 Q. Where is that somewhere else?

6 **A. Legal.**

7 Q. When did you start keeping a copy of binders
8 related to complaints of unintended discharges
9 related to the P320?

10 **A. It was from another deposition. I would say**
11 **two, three years ago.**

12 Q. As new complaints come in, do they get added
13 to your binder set?

14 **A. Not to that binder set, no.**

15 Q. So you had the four 3- or 4-inch binders
16 making up about a foot and a half of bookshelf
17 space based on the number of complaints as of
18 two years ago.

19 **A. From -- yeah, from that discovery.**

20 Q. Do you have a sense of how many complaints
21 have come in since you got your binder set?

22 **A. I do not, no.**

23 Q. What efforts were made for you to prepare you
24 to talk about the number of complaints since
25 we received this binder set?

1 **A. Well, I'm aware of around 200 complaints, and**
2 **that binder set does -- does not have all 200**
3 **complaints. So I don't know what was involved**
4 **in that discovery or what was asked. Those**
5 **binders were part of that. That's why I have**
6 **those binders.**

7 Q. Okay. And you say the number is roughly 200?

8 **A. Correct.**

9 Q. Like roughly 180 or roughly 280? I mean --

10 **A. I'd say it's -- if I had to estimate, it's a**
11 **little over 200.**

12 Q. Do you know what the number was at the time at
13 which you received your binder set?

14 **A. I do not.**

15 Q. Have you ever undertaken to count them?

16 **A. The number of incidents since the binder?**

17 Q. Yes.

18 **A. No.**

19 Q. Ever undertaken to count the number of
20 incidents in your binder?

21 **A. They are all numbered. I do not recall how**
22 **many there are but...**

23 Q. But we could look at the tabs to know how many
24 numbers there are?

25 **A. Correct.**

1 Q. And that would be easy, right?

2 **A. In theory, yes.**

3 Q. What would be hard about reading the numbers
4 off the tab?

5 **A. Depends on who's doing it.**

6 Q. For you?

7 **A. For me? No, it would not be difficult.**

8 Q. Are you aware of any other product line at Sig
9 Sauer that has received even half as many
10 unintended discharge reports as the P320 has?

11 **A. Not that I'm aware of.**

12 Q. And all the reports of unintended discharge is
13 coming through your department, right?

14 **A. No.**

15 Q. Okay. How else do they come in?

16 **A. If -- if they -- if the consumer decides to
17 send it through a dealer.**

18 Q. So let me ask it a different way then.

19 Of the reports of unintended discharges
20 that come in through your department, is
21 there -- is there any other line of pistols
22 that has even half as many reports of
23 unintended discharges?

24 **A. Not that I'm aware.**

25 Q. Is there any line of pistol made by Sig Sauer

1 that has even 25 percent of the number of
2 unintended discharge reports as the P320?

3 **A. I -- I'm not sure I'd be able to speak to that**
4 **historically because there are guns that we've**
5 **had previous to me working there.**

6 Q. I'm interested back to 2017.

7 **A. Not that I'm aware of.**

8 Q. Any that have even gotten 10 percent the
9 number?

10 **A. I couldn't say on that one.**

11 Q. What pistol offering by Sig Sauer since 2017
12 has gotten the second highest number of
13 reports of unintended discharges?

14 **A. Generally they're going to be guns -- more**
15 **conceal-carry type sort of guns because**
16 **they're ones that people handle more often.**
17 **So 365, 938, 238.**

18 Q. And just so the court reporter gets it down,
19 you said P365 --

20 **A. P365, P938, P238.**

21 Q. Do you have a sense of -- do you have a sense
22 of how many unintended discharge reports Sig
23 Sauer has received on the P365 since 2017?

24 **A. I do not.**

25 Q. Do you have a sense of how many reports of

1 unintended discharges Sig Sauer has received
2 on the P938 since 2017?

3 **A. I do not.**

4 Q. Do you have a sense of how many reports of
5 unintended discharges Sig Sauer has received
6 on the P238 since 2017?

7 **A. I do not.**

8 Q. You made reference to when lawsuits started
9 earlier in one of your answers.

10 How many times has Sig Sauer been named
11 as a defendant in a lawsuit related to an
12 unintended discharge of a P320 pistol?

13 **A. I'd say it's 45.**

14 Q. 45 lawsuits or 45 people?

15 **A. 45 lawsuits.**

16 Q. How many people?

17 **A. That I don't have -- that number I don't have
18 off the top of my head.**

19 Q. How would you find out?

20 MR. JOYCE: Other than that it's part of
21 the record?

22 **A. Yeah, I can look it up or consult with legal.**

23 BY MR. WERTS:

24 Q. Earlier this year a jury in Atlanta found Sig
25 Sauer liable in a lawsuit related to the P320,

1 correct?

2 MR. JOYCE: Objection to scope.

3 Foundation to the extent that it asks for a
4 legal opinion.

5 You can answer to the extent you know.

6 **A. We're appealing, but I do believe that that is**
7 **what happened.**

8 BY MR. WERTS:

9 Q. A jury came back against Sig Sauer, right?

10 **A. Yes.**

11 Q. Has anything been done to change the way in
12 which Sig Sauer responds to reports of
13 unintended discharges since then?

14 **A. Not that I'm aware of.**

15 Q. Has anything been done to change the
16 information that is provided to consumers when
17 they call in about the P320 since that jury
18 verdict?

19 **A. Do you have an example?**

20 Q. I'm just asking if you changed anything.

21 **A. No, there is no -- no information. We put out**
22 **a response saying that we were appealing the**
23 **decision.**

24 Q. Okay. And we're going to -- we've got several
25 e-mails we're going to look at.

1 My question is a little bit more tactical
2 as it relates to your department.

3 Did -- since that verdict came down, has
4 anything changed about the way in which your
5 team interacts with customers?

6 **A. No.**

7 Q. You indicated earlier that when people call in
8 with a report of an unintended discharge, that
9 the goal is to gather as much information as
10 possible.

11 Do you recall that?

12 **A. Correct.**

13 Q. Are customer service representatives provided
14 any information or training on what
15 information they may be able to provide to the
16 customer about the P320 during those calls?

17 **A. Are you asking if the customer service**
18 **representative makes customers aware of the**
19 **P320 or of anything additional, other than --**
20 **the service representative would be**
21 **responsible for collecting the information**
22 **as closely -- as possible.**

23 Q. Are they provided any talking points?

24 **A. We have a form or UD, sort of a UD checklist,**
25 **unintentional discharge.**

1 Q. How are customer service representatives at
2 Sig Sauer educated on the P320 platform?

3 A. Like they would be with any firearm. It's --
4 you have -- I will meet with them personally
5 to talk about the firearms and their
6 advantages and they'll ask questions.

7 I hire people based on varying levels of
8 whether they're strong customer service
9 experience or if they come from a firearm
10 background or other firearms companies. So it
11 really would depend on the customer service
12 representative on how I train them.

13 We also have a document that I've got, a
14 binder for -- it's a OneNote file, and it's a
15 living, breathing document for training on all
16 of our products.

17 Q. Okay. We didn't talk about OneNote as a
18 program earlier.

19 What do you use OneNote for?

20 A. It's -- it's just where we compile information
21 on -- on our products, skews, item numbers,
22 things like that.

23 Q. Who's we?

24 A. Me and my team, so my leadership.

25 Q. And who's that? Who are you referring to?

1 **A. So it would be myself; Mike Wood, who's my**
2 **operations manager; and then Amy Lord, who's**
3 **in charge of the E-coms; and then Ryan Dome;**
4 **who's in charge of the phone.**

5 Q. When you say E-coms, what does that mean?

6 **A. Electronic communications.**

7 Q. How long have you used OneNote in the customer
8 service department?

9 **A. We started using that around COVID.**

10 Q. So 2020-ish?

11 **A. Yeah, around there.**

12 Q. What did you use for maintaining files prior
13 to that?

14 **A. I made a binder.**

15 Q. Do you still have the binder?

16 **A. I believe I do.**

17 Q. When did you make the binder?

18 **A. 20 -- 2017.**

19 Q. Tell me about the binder.

20 **A. It has information that would be pertinent for**
21 **customer service representatives on common**
22 **calls or common inquiries.**

23 Q. Does it include information about the Sig
24 Sauer P320?

25 **A. Of course.**

1 Q. Does it include information on responding to
2 calls about unintended discharges?

3 **A. No. It's more product focused.**

4 Q. How big of a binder is it?

5 **A. Inch and a half.**

6 Q. There's just one version of the binder or has
7 it evolved with time?

8 **A. Well, the OneNote took over as a living**
9 **document.**

10 Q. Who all has access to the OneNote document
11 you're referring to?

12 **A. Customer service team.**

13 Q. What other resources are made available to the
14 customer service team, since they're working
15 remote, for product information and that sort
16 of thing?

17 **A. Armorers' classes, which are held at the Sig**
18 **academy, and they also have access to the**
19 **custom shop.**

20 Q. What does that mean?

21 **A. Usually have them sit in for a day or two, you**
22 **know, maybe once a year, just to better**
23 **understand how the custom shop works. Helps**
24 **us for a better customer experience to know**
25 **what are the turnaround times and what**

1 inventory and things, how things work. So if
2 we ask the custom shop to do something, we
3 know it's in reality.

4 Q. Any other resources made available to you?

5 A. Access to the team, but that's not really a
6 resource in the traditional sense; but we do
7 have a lot of institutional knowledge.

8 Q. You mentioned Teams. When I was speaking with
9 Matt Taylor yesterday -- do you know him?

10 A. Yeah.

11 Q. Okay. He said that his engineering team uses
12 Microsoft Teams for internal chat.

13 Do you guys use that?

14 A. Yes, we do. Yes. I overthought that one.

15 Q. What does the customer service team use for
16 Microsoft Teams, or what does Microsoft --
17 that's a terrible question. I'm going to try
18 to start over.

19 What does the customer service department
20 use Microsoft Teams for?

21 A. Video meetings and -- and a general discussion
22 board.

23 Q. Does your team use some of the internet or
24 groups' features within Teams or just the chat
25 discussion?

1 **A. Well, we are in a group that's customer**
2 **service, and Teams you can break off and make**
3 **another group if you want to; but it's not**
4 **something that we do. It's not policy to do**
5 **so.**

6 Q. How long are Teams chat messages from customer
7 relations or customer service kept?

8 **A. I want to say Teams keep those for about a**
9 **week.**

10 Q. Have you ever been asked to preserve or keep
11 any Teams chats related to the P320?

12 **A. No, though we -- we do that -- it's -- the**
13 **format for that is to e-mail it.**

14 Q. How long has the policy been to keep Microsoft
15 Teams chats for one week?

16 **A. I -- I'm not -- I'm not sure. We -- we**
17 **haven't been using Teams for that long.**

18 Q. How long have you been using Teams?

19 **A. Probably a year and a half, two years.**

20 Q. Have you ever been asked to search your Teams
21 messages for anything?

22 **A. No.**

23 Q. Have you ever been asked to pull any
24 information out of Microsoft Teams and put it
25 into an e-mail?

1 **A. No, I haven't been asked for that. No.**

2 Q. You mentioned another deposition earlier on.

3 Have you ever given a deposition for Sig
4 Sauer before?

5 **A. Yes.**

6 Q. How many times?

7 **A. Four.**

8 Q. When was the first one?

9 **A. I want to say it was around two-and-a-half**
10 **years ago.**

11 Q. 2021?

12 **A. Roughly.**

13 Q. What time of year was it?

14 **A. Sorry, I can't remember.**

15 Q. Where did you do it at?

16 **A. Some were done via Zoom.**

17 Q. Was that first deposition related to the
18 unintended discharge of a Sig Sauer P320?

19 **A. Yes, it was.**

20 Q. When was the second deposition?

21 **A. I want to say six months after that.**

22 Q. Was that also by Zoom?

23 **A. Yes.**

24 Q. Was the second deposition also related to
25 the -- the unintended discharge of a Sig Sauer

1 P320?

2 **A. Yes, it was.**

3 Q. Same lawyer?

4 **A. No, I don't believe so.**

5 Q. When was the third deposition?

6 **A. Well, it was probably around six months to a**
7 **year after that.**

8 Q. Was it also by Zoom?

9 **A. It wasn't. It was in person.**

10 Q. Where was it held?

11 **A. In an office building in Portsmouth.**

12 Q. Was that deposition related to a Sig Sauer
13 P320 unintended discharge?

14 **A. Yes, it was.**

15 Q. Was the lawyer on the third deposition the
16 same as either of the prior two?

17 **A. I don't believe so.**

18 Q. When was the fourth deposition before today?

19 **A. It was about a year ago.**

20 Q. Where did it occur?

21 **A. That was via Zoom.**

22 Q. Okay. Was that deposition related to the
23 unintended discharge of a Sig Sauer P320?

24 **A. Yes, it was.**

25 Q. Have you ever -- scratch that.

1 Have you ever testified live in court or
2 in any other live proceeding?

3 **A. Not in court, no.**

4 Q. Besides those four depositions, have you ever
5 given any other testimony under oath?

6 **A. No.**

7 Q. What did you do before you started working for
8 Sig Sauer?

9 **A. I was a sales representative.**

10 Q. For whom?

11 **A. Company called Music and Arts.**

12 Q. What were you selling?

13 **A. Musical instruments.**

14 Q. How long did you do that?

15 **A. For three years.**

16 Q. What did you do before that?

17 **A. I was a manager of a retail location.**

18 Q. What was that business?

19 **A. It was a company called Abercrombie & Fitch.**

20 Q. How long did you do that?

21 **A. Six months.**

22 Q. What did you do before that?

23 **A. I was a chef at a restaurant.**

24 Q. How long did you do that?

25 **A. About a year and a half.**

1 Q. What did you do before that?

2 **A. I was a student.**

3 Q. Did you graduate from college?

4 **A. I did.**

5 Q. With what kind of degree?

6 **A. I have a degree in music performance.**

7 Q. What's your instrument?

8 **A. Percussion.**

9 Q. My brother has degrees in piano, so
10 interesting.

11 **A. Cool.**

12 Q. The -- did you ever serve in the military?

13 **A. No.**

14 Q. Ever personally filed for bankruptcy?

15 **A. No.**

16 Q. Ever been convicted of a felony or
17 misdemeanor?

18 **A. No.**

19 MR. JOYCE: Do you mind if I just take
20 two minutes to visit the facilities?

21 MR. WERTS: Of course.

22 THE VIDEOGRAPHER: One moment. This is
23 the end of Media No. 2. We're going off the
24 record. The time is 11:15 a.m.

25 (Brief recess taken.)

1 THE VIDEOGRAPHER: This the beginning of
2 Media No. 3. We are going back on the record.
3 The time is 11:24 a.m.

4 BY MR. WERTS:

5 Q. All right. We've talked a little bit about
6 how the customer service team gathers
7 information about unintended discharges.

8 When a person calls in reporting on
9 unintended discharges, other than gathering
10 all the pertinent information, what else are
11 the representatives trained to convey or to do
12 on that call?

13 A. It's been -- it's to convey that we want to do
14 a full inspection and bring it inhouse.

15 Q. What else?

16 A. That's -- those are the two big things. Get
17 as much information and let's -- we can take a
18 look and see -- see if there's anything we can
19 find and go from there.

20 Q. And so what happens next in the process for
21 responding to that complaint?

22 A. So we would issue them a prepaid fully insured
23 shipping label. They would send us the
24 firearm. And we would inspect the firearm and
25 relay whatever findings there would be, also

1 be in the notes in Oracle, and then either --
2 and, you know, ship the firearm back or really
3 depends on what the case is.

4 Q. Other than shipping the firearm back, what are
5 other possible outcomes?

6 A. There's instances where the enduser wouldn't
7 want that firearm back just due to, you know,
8 the nature of the incident; like I don't
9 really want that gun. It's -- and then we
10 offer to, you know, replace it with a new
11 version of that gun.

12 Q. Are there -- does Sig Sauer ever offer to
13 replace such a gun with some other model?

14 A. There's an instance where I'm aware of us
15 doing this. They decided to swap to a P226
16 and paid the difference in price.

17 Q. Meaning the customer paid the difference?

18 A. Correct.

19 Q. The 226 is a more expensive gun than the P320?

20 A. Correct, yes.

21 Q. You said that the results of the inspection
22 are conveyed to the customer.

23 Who makes that conveyance?

24 A. The customer service representative that they
25 worked with.

1 Q. How do they go about doing that?

2 A. Either call them, and if don't pick up or, you
3 know, they might e-mail. But generally it's a
4 phone call.

5 Q. But some of those responses have been made by
6 e-mail?

7 A. It's possible.

8 Q. Have you ever looked?

9 A. Well, there's -- looked how, to see if we've
10 had a response through e-mail? It'd be like
11 if they're -- if they're not able to pick up,
12 hey, you know, this is what we found; what
13 would you like us to do.

14 I'm not sure. I've never looked --
15 there's no way for me to seek through
16 everyone's e-mail inbox to see what they sent.

17 Q. Have you ever asked members of your team to
18 look for such an e-mail?

19 A. The e-mail of what we would have sent a
20 customer?

21 Q. Mm-hmm.

22 A. No, I haven't, but there is also -- they're
23 also in the notes that go to the customer.

24 Q. What notes go to the customer?

25 A. Media repair shop notes.

1 Q. Like a printout?

2 A. Mm-hmm. Yes.

3 Q. Is that printout like a screenshot of the EBS
4 system, or is it like a formatted report like
5 some sort of piece of paper?

6 A. It's -- it's a -- it's a piece of paper. It's
7 a formatted report.

8 Q. Do you ever pull formatted reports out of the
9 EBS system?

10 A. No, that doesn't -- I see where you're going,
11 but that doesn't quite make sense. EBS -- the
12 notes that they're putting into that format
13 system are in Oracle, and then they put it in
14 that formatted report so...

15 Q. Right. I was asking a slightly different
16 question and more broader.

17 Just like you as a user, are you able to
18 pull information out of the EBS system and put
19 it into a report yourself, or do you have to
20 get somebody else to do it for you?

21 A. You mean am I able to copy/paste notes out of
22 it --

23 Q. Yeah.

24 A. -- and -- I could copy and paste the notes
25 from EBS and put them somewhere.

1 Q. Have you ever run reports on EBS like, hey, I
2 want to see a report of all of the unintended
3 discharge reports that have come in in the
4 last six months?

5 A. That's -- that's not a report that I would be
6 able to pull. That's why -- that's what
7 COGNOS does.

8 Q. Does SIG have people on staff that are able to
9 use COGNOS to do something like that?

10 A. I don't know if COGNOS can do that, but when
11 I -- when -- when there's a report that I
12 can't pull, generally I ask for -- that's what
13 COGNOS is.

14 Q. Who do you call?

15 A. That would be Chris Cogden like before.

16 Q. What was the last part?

17 A. Cogden.

18 Q. You said --

19 A. Oh, as mentioned before.

20 Q. Okay. I thought you said an alphanumeric
21 code. That's what I got confused by.

22 You're familiar with something called the
23 voluntary upgrade program; is that right?

24 A. Yes.

25 Q. Describe that for us, in a broad sense.

1 **A. Certainly. It's a -- it's a program that if**
2 **someone has a gun made before we put in**
3 **certain drop safety, that they could send in a**
4 **gun, and we would upgrade it free of charge.**

5 Q. Okay. How many guns did Sig Sauer upgrade
6 through that program?

7 **A. I don't have that number off the top of my**
8 **head. I couldn't speak confidently on that.**

9 Q. Who would you ask?

10 **A. I believe actually legal would have that**
11 **information.**

12 Q. Have you ever heard how much the voluntary
13 upgrade program costs Sig Sauer?

14 **A. No.**

15 Q. Do you know how many Missouri firearms were
16 upgraded through the voluntary upgrade
17 program?

18 **A. Not directly, no.**

19 Q. Prior to today's deposition, was anything done
20 to prepare you to testify about the use of a
21 voluntary program by Missouri residents?

22 **A. No, not -- not that I'm aware of.**

23 MR. JOYCE: Well, I'm just going to
24 object to the question.

25 Are you -- you mean as applied to

1 Missouri residents or generally how a Missouri
2 resident would access the program?

3 I'm not really understanding the -- the
4 scope of the question you asked. So I think
5 that the question and the response may have
6 been a little misleading, but -- I apologize
7 for the retroactive objection.

8 BY MR. WERTS:

9 Q. Let me ask it a different way.

10 Was anything done to prepare you to
11 testify about the voluntary upgrade today?

12 **A. No, not specifically.**

13 Q. So if I went through and asked a series of
14 questions, more details about the number of
15 guns or costs or the processes in the
16 voluntary upgrade program, would you be
17 prepared to answer any of those questions?

18 **A. Processes I would -- I would answer as best as**
19 **I could. As far as the numbers and money**
20 **behind it, I would not.**

21 Q. Let's talk about the process then.

22 How are consumers notified of the
23 existence of the voluntary upgrade program?

24 **A. I -- we -- we send it out as e-mails and PR**
25 **and made -- and notified media, like firearms**

1 media of its existence, as well as working
2 with, you know, various stuff like FFLs,
3 dealers, and just to notify as many people as
4 we could and then anyone who registered, I
5 believe, a P320 by direct e-mail.

6 Q. Okay. So I want to break kind of those down
7 by group.

8 So you contacted everyone in your
9 database by e-mail. All consumers?

10 A. I believe so, yes.

11 Q. You contacted all of the FFL dealers in Sig
12 Sauer's database?

13 A. That's my understanding.

14 Q. You said something about gun media.

15 What were you referring to there?

16 A. So there's -- there's common places where
17 people who are firearms enthusiasts get their
18 information or get their news. So TFB being
19 one of the largest ones.

20 Q. What's that?

21 A. TFB is just the most popular firearms YouTube
22 channel website, and there's like the Truth
23 About Guns. There's a couple different
24 avenues where when you notify -- the NRA,
25 where you would notify them and put out a

1 **release, this voluntary upgrade program for**
2 **the P320**

3 Q. So I want to drill into this a little bit.

4 So is it -- is it tfb.com if I wanted to
5 look at the website?

6 **A. Correct.**

7 Q. Okay. The Firearms Board?

8 **A. Firearms Blog.**

9 Q. Blog.

10 **A. Mm-hmm.**

11 Q. You said Truth About Guns?

12 **A. Yeah, I -- I -- that's one that's popular now.**

13 I don't know which ones were popular back
14 then. I would -- I would -- I would suspect
15 that probably Truth About Guns was popular
16 then enough to -- to be notified or existed.

17 Q. Okay. Are there any other such guns sites
18 that you're aware of that were contacted with
19 information about the voluntary upgrade
20 program?

21 **A. That -- that was outside of my scope. That's**
22 **more of a marketing question.**

23 Q. That was going to be my next question.

24 Like, who do I ask to find out who was
25 contacted about the voluntary upgrade program?

1 **A. I would suspect marketing.**

2 Q. Okay. And you think they would still have
3 that information?

4 **A. I couldn't say.**

5 Q. Do you have reason to think they would have
6 deleted it or erased their own memories about
7 it?

8 **A. I -- it's -- well, it's more job changes and**
9 **things of that nature, but I would suspect**
10 **that you would see those articles still out on**
11 **the web, you know, in cached format.**

12 Q. Were other news outlets contacted about the
13 voluntary upgrade program, Fox News, CNN, the
14 networks?

15 **A. I couldn't say. I'm not -- I don't know.**

16 Q. Did Sig Sauer give the best notice practicable
17 that it could about the voluntary upgrade
18 program?

19 MR. JOYCE: Object to the form.

20 You can answer.

21 **A. I couldn't say best. I think with -- within**
22 **reason of the information that we had, I think**
23 **we did -- that we did a good job of getting**
24 **the news out there, and -- for, you know, for**
25 **the upgrade.**

1 BY MR. WERTS:

2 Q. Sure. It's like anything. You can always do
3 something a little bit better, right?

4 MR. JOYCE: Objection to form.

5 **A. Unless you can't. I -- I don't know. It's --**

6 BY MR. WERTS:

7 Q. That was a bad question. Let me try it a
8 different way.

9 MR. JOYCE: I would agree with that.

10 MR. WERTS: Now, you don't get to -- you
11 get to object. You don't get to comment.

12 BY MR. WERTS:

13 Q. The --

14 MR. WERTS: Brent Musburger over here.

15 Q. And so did SIG do the best that it -- or try
16 to do the best job that it could?

17 **A. I believe we did.**

18 Q. In that vein, can we agree that a gun
19 manufacturer is required to disclose --
20 disclose any safety problems in one of its
21 products to the consuming public?

22 MR. JOYCE: Objection to form, scope, to
23 the extent that it asks for a legal opinion.

24 You can answer.

25 **A. I'm -- I'm not aware. I mean, I've -- I**

1 imagine it's best for the consumer to notify
2 your public of great things you're doing and
3 things to fix, and it's good practice to
4 notify people of what you're doing. But I
5 don't know if there's a legal standing, you
6 know, whoever has a -- like a recall, I
7 believe they have a legal standing, but I -- I
8 really couldn't speak to that.

9 BY MR. WERTS:

10 Q. Let me ask it a different way because we're
11 talking about policies and formulation of
12 policies in response to enforcing the
13 unintended discharge as one of your topics to
14 speak on behalf of Sig Sauer.

15 A. Mm-hmm.

16 Q. And what I want to understand is the approach
17 or philosophy in forming those topics. Okay?

18 And so does Sig Sauer think that it
19 should disclose safety problems in its pistols
20 to the consuming public?

21 MR. JOYCE: Objection to form.

22 A. I would say that Sig Sauer has and does as
23 we've had recalls in the past, and we notify
24 the public, and some of those recalls were in
25 extreme scenarios, and we still notified them,

1 which was costly to us and our reputation but
2 we still did it anyways.

3 BY MR. WERTS:

4 Q. Do you think it was the right thing to have
5 done?

6 A. Absolutely.

7 Q. Do you agree with me that SIG should disclose
8 risks or hazards in its product that may not
9 be apparent to a reasonable consumer?

10 MR. JOYCE: Objection to form to the
11 extent it calls -- calls for a legal opinion.

12 You can answer over the objection.

13 A. The reasonable consumer for a firearm, there's
14 an owners manual; we have a lot of information
15 on our website; we have digital owners
16 manuals; we have a video on the P320 and its
17 different safety mechanisms. So there's a lot
18 that's out there to the consumer if they
19 wanted to engage, but I couldn't speak to who
20 the average consumer is or the general
21 consumer as that changes day to day.

22 BY MR. WERTS:

23 Q. You drew a distinction in there that I just
24 want to understand.

25 You said a reasonable consumer of a

1 firearm. Is that something different than a
2 reasonable consumer in your mind?

3 **A. It's because you were putting it in the**
4 **context of safety, and firearms are inherently**
5 **dangerous. The consumer of bagels versus**
6 **consumer of firearms is a different -- you**
7 **know, there's overlap there, but it's a**
8 **different demographic in how you're contacting**
9 **them.**

10 Q. Some studies would say that bagels kill more
11 people than firearms but...

12 MR. JOYCE: You don't have to answer
13 that.

14 BY MR. WERTS:

15 Q. Can we agree that SIG should never
16 affirmatively misrepresent the safety of its
17 products?

18 MR. JOYCE: Object to form, foundation.
19 You can answer.

20 **A. Can you repeat that question?**

21 BY MR. WERTS:

22 Q. Sure.

23 Can we agree that SIG should never
24 affirmatively misrepresent the safety of its
25 products?

1 **A. I would agree that SIG should not**
2 **intentionally try to dissuade -- or try to**
3 **dissuade the truths or something if there was**
4 **an issue with a product that would, you know,**
5 **result in -- in danger or undue danger given**
6 **it's a firearm, if that answers the question.**

7 **Q. It does.**

8 Can we agree that SIG is never permitted
9 to conceal safety information about its
10 products?

11 MR. JOYCE: Objection to form. Again to
12 the -- foundation to the extent it calls for a
13 legal opinion.

14 You can answer.

15 **A. Do you have an example of this or --**

16 MR. JOYCE: He's asking -- he's asking a
17 general proposition.

18 **A. I'm not even quite sure I understand the**
19 **question.**

20 Are you saying that SIG would
21 intentionally hide information that would
22 be -- that the gun is dangerous?

23 BY MR. WERTS:

24 **Q. I'm actually not specifically asking about any**
25 **specific instance in this. I'm asking --**

1 **A. I'm not --**

2 Q. -- a philosophy in the way policies are
3 written.

4 And given the way that your -- your topic
5 is to talk about the formulation of policies.

6 Within the formulation of those policies,
7 is SIG permitted to conceal safety information
8 about its products?

9 MR. JOYCE: Same objection.

10 You can answer.

11 **A. Not that I'm aware of.**

12 BY MR. WERTS:

13 Q. Would it ever be okay to conceal safety
14 information?

15 MR. JOYCE: Same objection.

16 You can answer.

17 **A. No, I'm not aware of any instance or any time**
18 **or -- anytime where it would be okay for**
19 **safety information to be withheld or where we**
20 **wouldn't act on that.**

21 (Deposition Exhibit No. 2 was marked for
22 identification.)

23 Q. All right. I've handed you what we've marked
24 as Deposition Exhibit No. 2, which at the top
25 has a redaction, which is fine.

1 But what it starts is an e-mail from
2 Kevin Bakken to Joseph Lienemann.

3 Do you see that?

4 **A. I do.**

5 Q. Do you know who those two folks are?

6 **A. I do not.**

7 Q. The -- can you turn -- flip to the second page
8 for me, please?

9 **A. (Witness complying)**

10 Q. It mentions Kevin Bakken is a regional manager
11 of law enforcement sales.

12 Do you see that?

13 **A. Yes, I do.**

14 Q. We talked a little bit about the org tree
15 earlier.

16 Where does the regional manager of law
17 enforcement sales fit within that framework?

18 **A. That would be under LE, law enforcement.**

19 Q. Does the law enforcement department do
20 anything other than sales?

21 **A. It's my understanding that they would also --**
22 **that also includes service. So, just like I**
23 **handle RMAs for customers, repairs or things**
24 **of that nature for law enforcement.**

25 Q. Okay. Are there any differences -- let me ask

1 a better question.

2 Since 2017 have there been any
3 differences in the way in which reports of
4 unintended discharges of P320 have been
5 handled by the law enforcement department as
6 opposed to the customer service department?

7 **A. Any changes? Not that I'm aware of.**

8 Q. Any differences between -- do the LE folks do
9 it any differently than the CSR folks?

10 **A. Yes. There's a -- there are instances where**
11 **we will send someone to the department to --**
12 **to investigate as opposed to bringing the guns**
13 **in.**

14 Q. Okay. I want to break that down with a few
15 less pronouns.

16 When you say we send someone to the
17 department, who's the we?

18 **A. Law enforcement -- the law enforcement**
19 **agency -- or sorry. The law enforcement**
20 **department of Sig Sauer will send someone to**
21 **the law enforcement agency to inspect the**
22 **product.**

23 Q. But that's not something that's offered to
24 consumers?

25 **A. No.**

1 Q. Who gets sent?

2 **A. It could be someone who lives closer to that**
3 **region, but I don't know if there's any one**
4 **designated person.**

5 Q. Is there any group of such designated people?

6 **A. Not that I'm aware of.**

7 Q. Any other distinctions -- let me ask it again
8 better.

9 Have there been at any point any other
10 differences in the way in which the law
11 enforcement folks respond to reports of an
12 unintended discharge than the way the CSR
13 folks do?

14 **A. It's my understanding that they collect as**
15 **much information as they can and it's all**
16 **forwarded to legal.**

17 Q. Now, we talked about your four binders of
18 complaints that you've got, right?

19 **A. Yeah. The other instances, yes.**

20 Q. Yeah. Are those just consumer complaints or
21 do those also include law enforcement
22 complaints?

23 **A. Those are majority law enforcement.**

24 Q. Does Sig Sauer sometimes get inquiries from
25 media outlets about unintended discharge

1 reports?

2 **A. I'm sure we have.**

3 Q. How are those responded to?

4 MR. JOYCE: Beyond the scope.

5 You can answer to the extent you know.

6 **A. That would be -- that would be up to**
7 **marketing.**

8 BY MR. WERTS:

9 Q. Is public relations part of the marketing --

10 **A. I believe so.**

11 Q. -- department?

12 **A. Yes.**

13 MR. WERTS: This is for me.

14 MR. JOYCE: Okay.

15 (Deposition Exhibit No. 3 was marked for
16 identification.)

17 MR. WERTS: I'm sorry, that's not the
18 document I intended to hand you.

19 MR. JOYCE: Okay.

20 MR. WERTS: Let's just set that one
21 aside.

22 MR. JOYCE: Thank you.

23 (Deposition Exhibit No. 4 was marked for
24 identification.)

25 MR. JOYCE: Does the witness have it?

1 MR. WERTS: Not yet.

2 BY MR. WERTS:

3 Q. All right. I've handed you what has been
4 marked as Deposition Exhibit No. 4, and the
5 photocopying unfortunately is cut off at the
6 bottom, but these are numbered -- this begins
7 as SIG-GLASSCOCK00000027, and it's a
8 seven-page document.

9 I want to just identify a few people on
10 this. It starts as an e-mail from Bill
11 Larson.

12 Do you recognize that name?

13 **A. I do.**

14 Q. Who is that?

15 **A. He is the former customer service manager of**
16 **Sig Sauer.**

17 Q. And how many customer service managers are
18 there at Sig Sauer if there's more than one?

19 **A. At that time there was one.**

20 Q. How many are there now?

21 **A. There's me and operations manager.**

22 Q. How many total people are in the customer
23 service department at Sig Sauer?

24 **A. About 30.**

25 Q. How long has that been the number?

1 **A. Six months.**

2 Q. What was it in 2017?

3 **A. Probably around half that. Around 16-ish.**

4 **You said 2017?**

5 Q. Yes.

6 **A. Okay.**

7 Q. Did it grow kind of gradually and
8 continuously, or was there a big spike in the
9 number of bodies in the CSR office?

10 **A. There was a continual growth.**

11 Q. Was it any one thing or any specific things
12 that caused the need for additional growth?

13 **A. I would say a focus on better service.**
14 **Firearms industry is not known for having a**
15 **nice service. Going to a gun store for**
16 **people, it's scary. So it was more to turn**
17 **that around, as far as my thought process in**
18 **the hiring.**

19 Q. Okay. And so looking at our e-mail on our
20 Exhibit 4 it says: My folks have been
21 instructed to send these inquiries over to Tom
22 as requested.

23 Do you know who Tom is that's being
24 referred to in that context?

25 **A. I don't. I do see that there's a few Tom's**

1 cc'd in this. Tom Taylor, Tom Mechling. So
2 I -- I don't know.

3 Q. Okay. Who is Tom Taylor?

4 A. Tom Taylor is -- his title just changed, but
5 he's a C level employee in marketing.

6 Q. Who's Tom Mechling?

7 A. I don't know.

8 Q. All right. Can you turn to the fourth page of
9 the document?

10 A. (Witness complying)

11 Q. I want to turn your attention to the last part
12 of this string. It's the e-mail from Richard
13 Christopher.

14 Do you see that?

15 A. Yes.

16 Q. And the subject line is: New submission from
17 CS contact form.

18 Do you see that?

19 A. Correct.

20 Q. What is CS contact form?

21 A. Customer service contact form.

22 Q. Okay. We talked about a number of programs
23 earlier. That wasn't one of them and so --

24 A. It's -- a way to e-mail us is either e-mail
25 customerservice@sigsauer.com or there's a form

1 on our website and that form just sends it to
2 our e-mail.

3 Q. I see.

4 A. So it's the same -- it's just a different door
5 to the same place.

6 Q. Okay. Okay. That's the nature of my question
7 on that.

8 MR. WERTS: Yeah, just kind of keep a
9 stack going. The court reporter takes them
10 all at the end.

11 (Deposition Exhibit No. 5 was marked for
12 identification.)

13 BY MR. WERTS:

14 Q. We've handed you now what has been marked as
15 Deposition Exhibit No. 5.

16 Do you recognize what this form is?

17 A. Yes.

18 Q. What are we looking at?

19 A. This looks like the UD form.

20 Q. There's a date in the fifth or sixth line. On
21 the front cover there's a date of purchase.

22 A. Mm-hmm.

23 Q. How does a customer service representative
24 access this form in order it fill it out?

25 A. It's -- it's a Word Document that is on

1 **everyone's desktop.**

2 Q. Are there other forms for reporting other
3 sorts of firearms incidents besides unintended
4 discharges?

5 A. There is -- not -- so not the incidents, but
6 if a gun fails in any way, then it's very
7 similar to this. It's just minus the parts
8 where is -- is there a medical or is there a
9 police report. And then you'll ask questions
10 as what kind of, you know, gun were you using,
11 what kind of ammo, how many rounds do you have
12 through the gun, things of that nature.

13 Q. What's the name of that form?

14 A. It's service form.

15 Q. Any other forms that your CSRs have to fill
16 out or have they had at any time since 2017?

17 A. Not pertaining to RMAs, no.

18 Q. Pertaining to other things?

19 A. I'm sure there's HR forms or forms to submit
20 to --

21 Q. I'm talking about the public. I don't care
22 about your internal stuff.

23 A. No, no.

24 Q. Okay.

25 A. That I can recall.

1 Q. So at the top there's kind of some numbers
2 where there's an RMA, a serial number, and a
3 part number.

4 Can you tell us what those three things
5 are?

6 **A. So return merchandise authorization, that's**
7 **just saying -- that's like an order number.**
8 **It's saying -- this -- that RMA is associated**
9 **with that repair.**

10 Serial number is the serial number of the
11 gun.

12 And the part number is the physical gun
13 that it is. So a 320, full-sized 9
14 millimeter, black with SIG sights.

15 Q. All right. Can you turn to the second page of
16 this for me?

17 **A. (Witness complying)**

18 Q. It's kind of a screenshot.

19 Do you recognize what this is?

20 **A. Yes.**

21 Q. What is this?

22 **A. This is what an RMA looks like in Oracle.**

23 Q. Have you ever seen, like, reports that list
24 out the different RMAs or do you just always
25 look at screenshots like this?

1 **A. I look at individual RMAs.**

2 Q. Can you turn to the next page or page 3.

3 **A. (Witness complying)**

4 Q. So the right-hand side window, what is that?

5 **A. That is -- that is the notes for the depot**
6 **repair.**

7 Q. So these are notes that would have been put in
8 by the customer service representative?

9 **A. That is correct.**

10 Q. Can you turn to the sixth page of the
11 document.

12 **A. (Witness complying)**

13 Q. It is -- in the lower right-hand corner
14 there's the number 2083. It's actually the
15 low -- yeah.

16 All right. The print gets a little -- a
17 little small, but at the -- in the -- the
18 Notes box there's a section that says:
19 Attached is an inspection -- is the inspection
20 report. Do you see that?

21 It's under extra details.

22 **A. Yes. Yeah, I do see that.**

23 Q. What does it mean to attach a document within
24 the Oracle system?

25 Is that something you guys do? How does

1 that work?

2 **A. There is a way to do it. I can't say if this**
3 **is the instance. What -- so this is 2022.**
4 **That CSR might have been newer, so I don't**
5 **know if he knew how to necessarily do that, so**
6 **he might have copied and pasted it from e-mail**
7 **saying attached is this for legal. Or he**
8 **could have attached it -- there's a paperclip**
9 **function in Oracle where you can attach that**
10 **form. It's not a requirement that I have in**
11 **the requirements. Then it goes to legal.**

12 Q. Okay. And attaching the document is just
13 attaching a PDF like to an e-mail, right?

14 **A. Similar, yeah.**

15 Q. And then somehow within Oracle it gets
16 associated to that person and to this event,
17 right?

18 **A. Correct.**

19 MR. JOYCE: Just as a heads-up. Mr.
20 Lano -- I told him to come about 1:30. I
21 don't know how that works for you guys.

22 MR. WILLIAMS: I would push it.

23 MR. WERTS: I'd probably push it to 2:30.

24 MR. JOYCE: Okay.

25 MR. WILLIAMS: You think 2:30 or --

1 MR. WERTS: Yeah, this is going to go
2 pretty quick.

3 MR. WILLIAMS: Okay. Are you guys taking
4 a lunch or no?

5 MR. JOYCE: I think we will take lunch
6 before this over. I think we should just push
7 through and finish this, right?

8 MR. WILLIAMS: Yeah, that's fine.

9 MR. JOYCE: Okay. So I'll tell him
10 around 2:30?

11 MR. WERTS: Yeah.

12 MR. JOYCE: Okay.

13 MR. WERTS: He may have to wait for a
14 little bit but --

15 MR. JOYCE: That's okay.

16 MR. WERTS: -- it would be reasonable.

17 MR. JOYCE: I just don't want him hanging
18 for --

19 MR. WERTS: No. There's no reason for
20 him to wait and waste an extra hour. Just
21 chill in the lobby. The chairs are nice.

22 (Off-the-record colloquy.)

23 (Deposition Exhibit No. 6 was marked for
24 identification.)

25 BY MR. WERTS:

1 Q. All right. We've handed you what's now been
2 marked as Deposition Exhibit 6 --

3 **A. Okay.**

4 Q. -- which is an e-mail from a Marco Frayjo.

5 Are you -- happen to be familiar with
6 this report or inquiry on --

7 **A. Not one I'm aware of.**

8 Q. Okay.

9 **A. That I recall, but I may have seen it in 2020.**

10 Q. If an e-mail comes in like this to Sig Sauer,
11 is the e-mail typically responded to with some
12 sort of e-mail response?

13 **A. It may have been. We may have done an**
14 **outbound call.**

15 Q. How would you find out?

16 **A. How would I find out if we responded to this?**

17 Q. Yes.

18 **A. I would put this e-mail into Oracle, in notes.**

19 Q. If there is a return call on an e-mail inquiry
20 like this, is that call reported?

21 **A. The call -- the recording calls end for a year**
22 **so it wouldn't be available now, but it very**
23 **well could have been, though this is not a**
24 **claim of accidental or unintended or negligent**
25 **discharge. This is just someone inquiring why**

1 **there's different parts, it sounds like.**

2 Q. Sure. I'm just trying to understand the
3 process. I was just using this as a vehicle
4 for that.

5 **A. The call would have been recorded. I --**

6 Q. Would any effort have been made to store those
7 calls beyond the one year that you talked
8 about as a general retention policy?

9 **A. In this instance? I don't believe so.**

10 Q. When calls get saved beyond the one year
11 because it's related to an unintended
12 discharge, are those saved in the Oracle EBS
13 system or somewhere else?

14 **A. They are saved by legal.**

15 MR. JOYCE: This -- this -- this one
16 doesn't have a Bates stamp number on it. Do
17 you know what it is for us?

18 MR. WERTS: I do. It's
19 SIG-GLASSCOCK00007880.

20 MR. JOYCE: Shoot, those numbers to me
21 again? Sorry.

22 MR. WERTS: Sure. It's 7880 with a bunch
23 of zeros in the front.

24 MR. JOYCE: It just got cut off.

25 MR. WERTS: Yeah. All -- everything I

1 want to look at today has a number on it, so
2 if you don't see it, just ask.

3 MR. JOYCE: Okay.

4 (Deposition Exhibit No. 7 was marked for
5 identification.)

6 BY MR. WERTS:

7 Q. All right. I've handed you what's now been
8 marked as Deposition Exhibit 7, which is an
9 e-mail Bates No. 133.

10 And so this is a forwarded e-mail from
11 something that you sent maybe a couple times
12 and your name shows up in the chain, correct?

13 **A. Can I have extra time to read it?**

14 Q. Of course. Take your time.

15 **A. (Pause). You said my name's on this one?**

16 Q. Yes, on the first page a couple places.

17 **A. Did you hand me the right one?**

18 Q. Let me see.

19 MR. JOYCE: I don't see it either.

20 MR. WERTS: Oh, no. What's happening
21 here.

22 MR. JOYCE: I think this would be beyond
23 the scope of this witness anyway.

24 MR. WERTS: Put it in the dead stack.

25 What I get for trying to save trees.

1 MR. JOYCE: Yeah.

2 MR. WERTS: This one really is 133. The
3 other one was not. It's 128 if you want --

4 (Deposition Exhibit No. 8 was marked for
5 identification.)

6 (Off-the-record colloquy.)

7 **THE WITNESS: Okay.**

8 BY MR. WERTS:

9 Q. All right. So this one actually does have
10 your name on it a couple times so that
11 probably makes more sense.

12 **A. It does.**

13 Q. Let's kind of start at the top.

14 Who's Scott Therrien?

15 **A. Scott Therrien is a former employee of Sig
16 Sauer. He's the senior VP of commercial sales
17 and customer service.**

18 Q. And so looking at the bottom of the first page
19 on this exhibit, it's an e-mail you sent to
20 Mr. Therrien on August 26, 2021, correct?

21 **A. That -- that's what that looks like, yes.**

22 Q. Okay. And you're informing Mr. Therrien that
23 there were several reports, four of which had
24 happened in the last hour, of unintended
25 discharges, correct?

1 A. I just want to confirm that.

2 Well, where does it say that happened in
3 the last hour?

4 Q. Very top of the second page.

5 A. Very top of the second page. Yes.

6 Q. And if we go back to the first page, it says
7 that you checked your incoming e-mails, as
8 well, and there are two reports.

9 So that would be six total reports on
10 that day or is it four total reports?

11 A. I -- if you just give me a moment, I just want
12 to check where I was.

13 Six, yes. So that would have been two
14 additional in the e-mail. Maybe not in that
15 hour due to the nature of e-mail.

16 Q. But certainly on the same day, right?

17 A. Possibly same day or within a close enough
18 time frame if -- depending on how quickly we
19 were answering e-mails during that time.

20 Q. Do you normally answer e-mails longer than one
21 business day?

22 A. We quote two to three and generally answer
23 within one.

24 During COVID it was really hard to
25 keep -- the whole world, you know, kind of

1 exploded, so I can't say during 2021 exactly
2 how long we were answering e-mails or how long
3 it took us to answer e-mails, but...

4 Q. But by August of 2021, you were in -- that --
5 that's not the same as May of 2020, right?

6 A. Correct. It would have been within a week.

7 Q. And -- and this -- this mentions a couple
8 things, voice recording, which we talked
9 about.

10 A. Mm-hmm.

11 Q. And I know the call is recorded when the
12 customer calls and reports an unintended
13 discharge.

14 Is the call also recorded on the outbound
15 call telling the customer the results of
16 whatever investigation Sig Sauer has
17 performed?

18 A. They should be provided that Task is -- is
19 functioning, yes.

20 Q. And are those calls also sent to legal to be
21 kept?

22 A. The outbound I -- no, it's -- it's not
23 standard practice to have the outbound of us
24 telling them what we found.

25 Q. How long are those calls kept on the outbound

1 calls then?

2 **A. How long are they -- well, Task keeps calls**
3 **for a year.**

4 Q. Has anyone ever told you to keep those calls
5 longer than one year?

6 **A. Well, if -- if we pull the call, then it's**
7 **saved indefinitely, but I don't -- it's not**
8 **a -- it's not a term that I have access to. I**
9 **can't make it two years or three years.**

10 Q. And then if you'll look -- maybe the best one
11 is on the third page. It starts with the
12 8/5/2021 with Dave Powers.

13 Do you see that?

14 **A. Yes.**

15 Q. And so there's -- this appears to be similar
16 information that was on the unintended
17 discharge form that we looked at earlier, but
18 it's an e-mail.

19 Is this just a copy and paste job or is
20 it like an e-mail template form that you folks
21 are using?

22 **A. This is an e-mail from me to Scott, and I was**
23 **getting -- it's very likely that I copied this**
24 **form from the RMA just to put it on the e-mail**
25 **to notify him.**

1 (Deposition Exhibit No. 9 was marked for
2 identification.)

3 Q. Hand you now what's been marked as Deposition
4 Exhibit 9.

5 Do you recognize the format of this form?

6 **A. It looks familiar to the format of the**
7 **customer service.**

8 Q. Okay. You'll see down in paragraphs 4 and 5
9 it talks about involvement of the EVP of LE
10 sales.

11 Do you see that?

12 **A. Yes.**

13 Q. And so what conclusions about this form do you
14 draw from that?

15 **A. That the EVP of LE sales would want to review**
16 **the UD.**

17 Q. Okay. And so is this the form that's used in
18 the LE department for their intake of
19 unintended discharge reports?

20 **A. It looks like a version of it. If you look at**
21 **the rest of 5 it says, and also information to**
22 **Tim Lachance and Steve Shawver, who were with**
23 **our legal department at the time.**

24 Q. Okay. So whenever you get a consumer
25 complaint or report of an unintended

1 discharge, is that elevated to an executive
2 vice-president?

3 **A. There's no executive vice president of**
4 **customer service, but it does go to -- a**
5 **C-level employee of legal would see it.**

6 Q. Anyone outside of the legal department?

7 **A. I mean, the custom shop is made aware.**

8 Q. Anyone else?

9 **A. Our determination is that legal has to be**
10 **notified.**

11 Q. The law enforcement form we're looking at kind
12 of has some detailed steps by step of what the
13 process is for responding to the report of the
14 unintended discharge in paragraphs 2 through
15 10. Whereas, the report we looked at earlier
16 from the customer service was just kind of a
17 fill-in-the-blank form, right?

18 **A. Mm-hmm.**

19 Q. Is that a yes?

20 **A. Correct, yes.**

21 Q. Do you have a detailed step-by-step procedure
22 form for consumer reports of unintended
23 discharges like the law enforcement folks
24 have?

25 **A. No. Where this is different is because there**

1 are -- there's -- there's differences in this
2 report, which is what I was explaining before;
3 like, did it effect an arrest is not a
4 question that we would ask the consumer.
5 Consumers have one portal to contact us. In
6 multiple ways they can contact us, but there's
7 one portal. Whereas, LE it's a little -- they
8 have more access to be able to send it out to
9 them or otherwise. So I believe that's why
10 they have these additional steps, which just
11 don't apply to the direct consumer.

12 Q. Okay. But the -- I guess the shorter answer
13 is there's not a document that sets up the
14 steps for consumer reports, true, or is there?

15 A. A document that says what to do?

16 Q. Yes.

17 A. Not an official document, but the UD form is
18 meant to always go to legal. And that's --
19 it's the only -- a really small form. Make
20 sure that it gets to legal.

21 Q. Okay.

22 A. Yeah.

23 Q. And sometimes that's an answer. I just want
24 to -- if there's a form that says how to do
25 that, I just want to know about it.

1 **A. No. I believe the reason that this has a form**
2 **is because it could be that it's agency-owned**
3 **guns, guns owned by the individual or the law**
4 **enforcement officer. There's just a lot more**
5 **variables that go into the law enforcement**
6 **side that I'm not entirely privy to.**

7 MR. WERTS: Let's take a short break.

8 MR. JOYCE: Okay.

9 THE VIDEOGRAPHER: One moment, please.

10 This is the end of Media Unit No. 3. We
11 are going off the record. The time is
12 12:24 p.m.

13 (Brief recess taken.)

14 THE VIDEOGRAPHER: This is the beginning
15 of Media No. 4. We are going back on the
16 record. The time is 12:51 p.m.

17 BY MR. WERTS:

18 Q. Okay. Just a few things to wrap up.

19 Can you grab Exhibit 8 for me, please.

20 **A. (Witness complying)**

21 Q. All right. This is the e-mail chain that you
22 were on where you were forwarding the total of
23 six unintentional discharge reports in a given
24 day, right, or at least in one set of
25 communications?

1 **A. I actually -- I recall this e-mail. I believe**
2 **this is me alerting my boss at the time, hey,**
3 **we just got a surge of these. You know,**
4 **what's -- was there a reason or just so he's**
5 **aware, you know.**

6 Q. Fair enough. And of those six reported
7 unintended discharges, is it correct that five
8 were P320s and one was a P365?

9 **A. I could confirm. That looks to be correct.**

10 Q. All right. Thank you. Finished with that.

11 You shared a couple topics with Mr.
12 Taylor where he was handling the engineering
13 side of things. You had kind of the incident
14 RMA side.

15 I just want to -- I think I understand
16 this, but I -- I think the answer is going to
17 be no honestly, but just make to sure that I'm
18 not missing something.

19 Has the customer service department ever
20 been involved in any case study or
21 investigation by Sig Sauer regarding the use
22 of external safeties on the P320?

23 **A. The use of them?**

24 Q. Yeah.

25 **A. In -- like just any use of external safeties?**

1 Q. Yes.

2 **A. No.**

3 Q. Ever any case studies or investigations into
4 consumer customer preferences with regard to
5 external safeties?

6 **A. Not that customer service have been involved**
7 **in.**

8 Q. Are you aware of any such case studies or
9 investigations by anyone?

10 **A. I don't know about specifically with manual**
11 **safeties, but you could look at gun sales and**
12 **trends now and see how many have manual**
13 **safeties.**

14 Q. With regard to the various incidents that
15 we've talked about or the unintended discharge
16 reports that resulted in RMAs, you kind of
17 went through the process of sending the RMA
18 out to folks; they send the gun in; Sig Sauer
19 inspects it; the gun gets sent back to the
20 customer; and they get a written report that's
21 included with the gun, as well as a phone call
22 explaining the results.

23 Is that correct?

24 **A. We would normally call before sending the gun**
25 **back, but, yes, that is all correct.**

1 Q. Okay. And that's been the same process for
2 every unintended discharge report going back
3 to 2017, correct?

4 **A. Unintended discharge or one that just needed,**
5 **what I would call, white glove treatment,**
6 **particular customers. That scuff on that grip**
7 **is not a scuff; it's actually, you know, the**
8 **letter R; it's a Sig Sauer, whatever it might**
9 **be. But generally in those instances.**

10 But in UD and in sort of white-glove
11 scenarios, we call them before sending the gun
12 back.

13 Q. Okay. But I just want to make sure it's a
14 uniform process for every unintended discharge
15 report from consumers, correct?

16 **A. That's my understanding.**

17 Q. Okay. And that's true for all U.S. consumers,
18 right?

19 **A. That's correct.**

20 Q. Going back to 2017 at least?

21 **A. Yes, that's -- as far as I can recall.**

22 Q. All right.

23 MR. WERTS: Thank you for your time and
24 patience today. Those are the questions I
25 have for you.

1 **THE WITNESS: Okay.**

2 MR. JOYCE: I have no questions of the
3 witness.

4 THE VIDEOGRAPHER: This is the end of
5 Media No. 4, and this marks the end of the
6 deposition of Chris Meyer.

7 **THE WITNESS: Nailed it.**

8 THE VIDEOGRAPHER: We are going off the
9 record. The time is 12:56 p.m.

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STATE OF NEW HAMPSHIRE.

I, Beth Gaige, RPR, and licensed court reporter in the State of New Hampshire, do hereby certify that the within-named deponent was sworn to testify the truth, the whole truth, and nothing but the truth in the aforementioned cause of action.

I further certify that this deposition was stenographically reported by me and later reduced to print through computer-aided transcription, and the foregoing is a full and true record of the testimony given by the deponent.

I further certify that I am a disinterested person in the event or outcome of the above-named cause of action.

IN WITNESS WHEREOF, I have hereunto set my hand this 1st day of October, 2024.



Beth Gaige, LCR/RPR
New Hampshire Lic. No: 00153